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LexisNexis File & Serve S	
Maureen Davis 2300 Contra Costa Blvd Pleasant Hill, CA 94523-3961 TELEPHONE NO.: 9252881776 FAX NO. (Optional):	
UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA	
PLAINTIFF/PETITIONER: INTERSTATE FIRE & CASUALTY COMPANY, AN ILLINOIS CORPORATION DEFENDANT/RESPONDENT: PACIFIC EMPLOYERS INSURANCE COMPANY, A PENNSYLVANIA CORPORATION	CASE NUMBER: <b>EDCV06-0593</b>
<b>PROOF OF SERVICE OF SUMMONS</b>	Ref. No. or File No.: <b>13254567</b>

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the (specify documents): **Subpoena in A Civil Case with Attachment**
3. a. Party served (specify name of party as shown on documents served):  
**COCHRAN CHERRY GIVENS & SMITH**  
b. Person served: ☒ party in item 3a ☐ other (specify name and relationship to the party named in item 3a):  
**ASTRIK SALAZAR, CASE ANALYST, female**
4. Address where the party was served:  
**4929 WILSHIRE Boulevard SUITE 1010, LOS ANGELES, CA 90010**
5. I served the party (check proper box)
  - a. ☒ **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **12/21/2006** (2) at (time): **3:36 PM**
  - b. ☐ **by substituted service.** On (date): (2) at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - (1) ☐ **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - (2) ☐ **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - (3) ☐ **(physical address unknown)** a person of at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - (5) ☐ I attach a **declaration of diligence** stating actions taken first to attempt personal service.



- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,  
(1) on (date): (2) from (city):  
(3) ☐ with two copies of the Notice and Acknowledgment of Receipt and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgment of Receipt.) (Code Civ. Proc., § 415.30)  
(4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant
- d. ☒ On behalf of (specify):  
under the following Code of Civil Procedure section:
- |                                                                   |                                                                       |
|-------------------------------------------------------------------|-----------------------------------------------------------------------|
| <input type="checkbox"/> 416.10 (corporation)                     | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|                                                                   | <input type="checkbox"/> other                                        |

7. Person who served papers

- a. Name: **JORGE RIVERA**
- b. Address: **241 S. FIGUEROA STREET, SUITE 370, LOS ANGELES, CA 90012**
- c. Telephone number: **213-621-9999**
- d. The fee for service was: \$
- e. I am:
- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:
- (i) ☐ owner ☐ employee ☒ independant contractor
- (ii) ☒ Registration No.: **4690**
- (iii) ☒ County: **LOS ANGELES, CA**

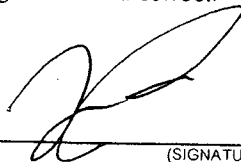
8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  
or

9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: **12/21/2006**

**JORGE RIVERA**

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)



(SIGNATURE)



AO 88 (Rev.11/94) Subpoena in a Civil Case

**PROOF OF SERVICE**

DATE 12/21/04

PLACE 4929 Wilshire Blvd Ste 1010  
LA, CA 90010

**SERVED**

ASTRIK SALAZAR

PERSONAL

SERVED ON (PRINT NAME)

MANNER OF SERVICE

Jorge Rivera, REG #4690

CASE ANALYST

SERVED BY (PRINT NAME)

TITLE

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

12/21/04  
DATE

SIGNATURE OF SERVER

241 S Figueroa St #370  
ADDRESS OF SERVER  
LA, CA 90012

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to

attend trial be commanded to travel from any such place within the state in which the trial is held, or the demanding party to contest the claim,

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in who behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) DUTIES IN RESPONDING TO SUBPOENA.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

AO 88 (Rev.11/94) Subpoena in a Civil Case

Issued by the  
**UNITED STATES DISTRICT COURT**  
CENTRAL DISTRICT OF CALIFORNIA

INTERSTATE FIRE & CASUALTY COMPANY,  
an Illinois Corporation,  
Plaintiff,

v.

PACIFIC EMPLOYERS INSURANCE COMPANY, a  
Pennsylvania Corporation  
Defendant,

**SUBPOENA IN A CIVIL CASE**

Case Number:<sup>1</sup> EDCV06-0593 VAP (OPx)

TO: Cochran Cherry Givens & Smith  
4929 Wilshire Blvd, Suite 1010  
Los Angeles, CA 90010-3856

- ☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Attachment A to Subpoena to Cochran Cherry Givens & Smith

PLACE

Cochran Cherry Givens & Smith  
4929 Wilshire Blvd, Suite 1010 Los Angeles, CA 90010-3856

DATE AND TIME

10:00 AM 1/19/2007

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME ADDRESS AND TELEPHONE NUMBER

Marilyn A. Rogers  
2300 Contra Costa Blvd., Suite 310 Pleasant Hill, CA 94523

MORALES & GARY

12-20-06

(925) 288-1776

(See Rule 45, Federal Rules of Civil Procedure, parts C & D on reverse)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO 88 (Rev.11/94) Subpoena in a Civil Case

**PROOF OF SERVICE**

DATE

PLACE

**SERVED**

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to

attend trial be commanded to travel from any such place within the state in which the trial is held, or the demanding party to contest the claim.

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in who behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) DUTIES IN RESPONDING TO SUBPOENA.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**ATTACHMENT A TO SUBPOENA TO COCHRAN CHERRY GIVENS & SMITH**  
**DEFINITIONS**

1. "AND", "OR" connote the conjunctive, disjunctive, or both.
2. "EACH," "ANY," OR "ALL" means each, every, any, AND all.
3. "PERSON(S)" includes ALL people AND entities whatsoever, whether real OR juridical, incorporated OR unincorporated.
4. "RELATING TO" means constituting, concerning, discussing, depicting, referring to OR pertaining to.
5. "DOCUMENT(S)" includes without limitation correspondence, teletype messages, telegrams, contracts, agreements, memoranda, understandings, e-mails, notes, rough drawings, bulletins, circulars, diagrams, interoffice COMMUNICATIONS, books of account, tax statements, ledgers, journals, checks, check registers, passbooks, invoices, bills orders, quotations, stock certificates, financial statements, statements of account, statements of liability, balance sheets, graphs AND plans AND ANY other writing memorializing, reflecting, referring to, relating to, OR evidencing the subject of EACH DOCUMENT OR group of DOCUMENTS request. The term DOCUMENTS means the original, including ALL duplicates, copies OR drafts, ANY non-identical copy OR copies that differ from the original for ANY reason, including but not limited to, the making of notes thereon, of ANY writing AND paper, book OR record of whatever kind OR description, electronic, OR photographic OR other means, AND shall include ANY recorded, taped, filmed OR graphic matter OR phonic (e.g. ANY tape recording) OR visual reproduction OR record of ANY oral statement, conversation OR event.
6. "COMMUNICATION(S)" means ANY oral, written OR electronic transmission of information, opinion, belief, idea OR statement, including without limitation, letters OR other written correspondence, conversations, meetings, discussions, telephone calls, memoranda, notes, messages (including "e-mail," OR internal OR external text-messaging), telecopies, telexes AND facsimile transmissions.
7. "YOU" AND "YOUR" mean AND refer to Cochran Cherry Givens & Smith, AND



1 includes without limitation ALL predecessors, successors, affiliates, divisions, area OR regional  
2 offices, partners, employees, agents, ANY representatives of Cochran Cherry Givens & Smith, AND  
3 ALL PERSONS acting on behalf of ANY of the foregoing.

4 8. "UNDERLYING ACTIONS" includes without limitation ALL of the following ten  
5 actions:

6 (1). *Socorro Mendoza, et al. v. Gonzalez, Inc. dba Golden State*  
7 *Transportation, et al.*, Riverside County Superior Court, Case No. 391704;

8 (2). *Alfred Chacon, et al. v. Golden State Transportation Services, Inc., et*  
9 *al.*, Los Angeles County Superior Court, Case No. BC298227 (later filed in Riverside  
10 County Superior Court, Case No. RIC 406050);

11 (3). *Maria Delgado, et al. v. Miguel Pulido, et al.*, Riverside County  
12 Superior Court, Case No. INC 037713;

13 (4). *Arminda Gonzalez, et al. v. Golden State Transportation Services,*  
14 *Riverside County Superior Court, Case No. INC 037910;*

15 (5). *Liz Huerta, et al. v. Greyhound Lines, Inc., et al.*, Los Angeles County  
16 Superior Court, Case No. BC301249 (later filed in Riverside County Superior Court,  
17 Case No. RIC406066);

18 (6). *Jose Trinidad Romo, et al., v. SITA, Inc., et al.*, Riverside County  
19 Superior Court, Case No. INC 037382;

20 (7). *Martha Vazquez, et al. v. Miguel Pulido, et al.*, Riverside County  
21 Superior Court, Case No. INC 037708;

22 (8). *Gaspar Zaragoza v. Golden State Transportation Co., Inc., et al.*,  
23 *Riverside County Superior Court, Case No. INC 037760;*

24 (9). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, United  
25 States District Court, Central District, Case No. 2:03-CV-06041-RMT-SS; AND

26 (10). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, Riverside  
27 County Superior Court, Case No. INC 038854.  
28



1           9.       “PLAINTIFFS” means AND refers to the plaintiffs in the UNDERLYING  
2 ACTIONS, AND includes without limitation ALL agents, representatives, AND ALL PERSONS  
3 acting on behalf of ANY of the foregoing.

4           10.      “ACCIDENT” means AND refers to the accident occurred on August 24, 2002,  
5 which is the subject of the UNDERLYING ACTIONS.

6           11.      “BUS” means AND refers to the 1998 MCI Passenger Bus that was involved in the  
7 ACCIDENT.

8           12.      “PULIDO” means AND refers to Miguel Pulido, one of the defendants in the  
9 UNDERLYING ACTIONS.

10          13.      “PACIFIC EMPLOYERS” means AND refers to Pacific Employers Insurance  
11 Company AND includes without limitation ALL predecessors, successors, parent companies,  
12 subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers,  
13 employees, agents, ANY representatives of Pacific Employers Insurance Company, AND ALL  
14 PERSONS acting on behalf of ANY of the foregoing.

15          14.      “INTERSTATE” means AND refers to Interstate Fire & Casualty Company AND  
16 includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates,  
17 divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY  
18 representatives of Interstate Fire & Casualty Company, AND ALL PERSONS acting on behalf of  
19 ANY of the foregoing.

20          15.      “REPUBLIC” means AND refers to Republic Western Insurance Company AND  
21 includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates,  
22 divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY  
23 representatives of Republic Western Insurance Company, AND ALL PERSONS acting on behalf of  
24 ANY of the foregoing.

25          16.      “GREYHOUND” means AND refers to Greyhound Lines, Inc. AND includes  
26 without limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR  
27 regional offices, managing agents, directors, officers, employees, agents, ANY representatives of  
28

1 Greyhound Lines, Inc., AND ALL PERSONS acting on behalf of ANY of the foregoing.

2 17. "SAFECO" means AND refers to Safeco Credit Company AND includes without  
3 limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR regional  
4 offices, managing agents, directors, officers, employees, agents, ANY representatives of Safeco  
5 Credit Company, AND ALL PERSONS acting on behalf of ANY of the foregoing.

6 18. "GOLDEN STATE" means AND refers to Gonzales, Inc. AND Gonzales, Inc. d/b/a  
7 Golden State Transportation Co., AND includes without limitation ALL predecessors, successors,  
8 parents, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors,  
9 officers, employees, agents, ANY representatives of Gonzales, Inc. AND Gonzales, Inc. d/b/a  
10 Golden State Transportation Co., AND ALL PERSONS acting on behalf of ANY of the foregoing.

## 11 INSTRUCTIONS

12  
13 1. The DOCUMENTS OR objects subpoenaed are those DOCUMENTS OR objects in  
14 the possession OR in the control of YOU, agents, representatives, OR anyone acting for OR on  
15 YOUR behalf, regardless of whether such DOCUMENTS OR things are possessed directly by YOU  
16 OR YOUR partners, directors, officers, agents, employees, representative, investigators, OR by  
17 YOUR agents, employees, representative OR investigators.

18 2. If ANY DOCUMENT OR object is not produced on the ground that it is privileged  
19 OR otherwise claimed to be protected against production by ANY rule of law, YOU shall provide  
20 the following information with respect to EACH such DOCUMENT OR object:

21 (1). Its date;

22 (2). IDENTIFY EACH AND every author AND other PERSON who prepared OR  
23 participated in the preparation of it:

24 (3). IDENTIFY EACH AND every PERSON who ever received it from ANY source  
25 AND for EACH, the date it was received;

26 (4). IDENTIFY EACH AND every PERSON from who it was received;

27 (5). IDENTIFY ALL other PERSONS to whom its content were disclosed, the dates such

1 disclosure took place AND the means of such disclosure;

2 (6). The nature of the privilege OR rule of law relied upon AND the facts supporting  
3 YOUR position with respect thereto.

4 3. If ANY subpoenaed DOCUMENT OR object cannot be produced in full, produce it  
5 to the greatest extent possible, indicating which part of the DOCUMENT OR object has been  
6 withheld, AND the reason for it being withheld.

7 4. If a DOCUMENT OR object once existed, but it has been lost OR destroyed, OR  
8 otherwise is no longer in YOUR possession, IDENTIFY EACH DOCUMENT OR object AND  
9 state the following concerning its loss OR destruction:

10 (1). When it was lost OR destroyed

11 (2). Where it was lost OR destroyed;

12 (3). IDENTIFY its last known custodian.  
13  
14

15 **DEMANDS FOR PRODUCTION AND INSPECTION**

16 DEMAND FOR PRODUCTION AND INSPECTION NO. 1:

17 A complete copy of YOUR files RELATING TO the ACCIDENT OR the UNDERLYING  
18 ACTIONS.  
19

20 DEMAND FOR PRODUCTION AND INSPECTION NO. 2:

21 ALL DOCUMENTS RELATING TO YOUR investigation RELATING TO the ACCIDENT  
22 OR the UNDERLYING ACTIONS.  
23

24 DEMAND FOR PRODUCTION AND INSPECTION NO. 3:

25 ALL DOCUMENTS RELATING TO ANY investigation RELATING TO the ACCIDENT OR  
26 the UNDERLYING ACTIONS.  
27  
28

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 4:

2 ALL DOCUMENTS RELATING TO the PLAINTIFFS' damages as a result of the ACCIDENT.

3  
4 DEMAND FOR PRODUCTION AND INSPECTION NO. 5:

5 ALL DOCUMENTS RELATING TO the ACCIDENT.

6  
7 DEMAND FOR PRODUCTION AND INSPECTION NO. 6:

8 ALL DOCUMENTS RELATING TO ANY reports generated by, from OR on behalf of YOU  
9 RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

10  
11 DEMAND FOR PRODUCTION AND INSPECTION NO. 7:

12 ALL DOCUMENTS RELATING TO the employment of PULIDO, including but not limited  
13 to his employment application, personnel file, driving record, history, citations, violations, AND log  
14 books.

15  
16 DEMAND FOR PRODUCTION AND INSPECTION NO. 8:

17 ALL pleadings in the UNDERLYING ACTIONS.

18  
19 DEMAND FOR PRODUCTION AND INSPECTION NO. 9:

20 ALL discovery requests AND responses in the UNDERLYING ACTIONS.

21  
22 DEMAND FOR PRODUCTION AND INSPECTION NO. 10:

23 ALL DOCUMENTS produced in the discovery of ANY of the UNDERLYING ACTIONS.

24  
25 DEMAND FOR PRODUCTION AND INSPECTION NO. 11:

26 ALL DOCUMENTS produced by ANY party to the UNDERLYING ACTIONS.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 12:

2 ALL deposition transcripts for depositions taken in ANY of the UNDERLYING ACTIONS.

4 DEMAND FOR PRODUCTION AND INSPECTION NO.13:

5 ANY witness statements taken from ANY PERSONS RELATING TO the UNDERLYING  
6 ACTIONS.

8 DEMAND FOR PRODUCTION AND INSPECTION NO. 14:

9 A copy of ALL settlement agreements AND releases for EACH of the UNDERLYING  
10 ACTIONS.

12 DEMAND FOR PRODUCTION AND INSPECTION NO. 15:

13 ALL DOCUMENTS RELATING TO the disposition, settlement OR final resolution of  
14 EACH of the UNDERLYING ACTIONS.

16 DEMAND FOR PRODUCTION AND INSPECTION NO. 16:

17 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
18 COMMUNICATION by, from OR on behalf of YOU regarding the subject matter of ANY of the  
19 UNDERLYING ACTIONS.

21 DEMAND FOR PRODUCTION AND INSPECTION NO. 17:

22 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
23 COMMUNICATION by, from OR on behalf of INTERSTATE regarding the subject matter of ANY  
24 of the UNDERLYING ACTIONS.

26 DEMAND FOR PRODUCTION AND INSPECTION NO. 18:

27 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
28

1 COMMUNICATION by, from OR on behalf of REPUBLIC regarding the subject matter of ANY of  
2 the UNDERLYING ACTIONS.

3  
4 DEMAND FOR PRODUCTION AND INSPECTION NO. 19:

5 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
6 COMMUNICATION by, from OR on behalf of PACIFIC EMPLOYERS regarding the subject matter  
7 of ANY of the UNDERLYING ACTIONS.

8  
9 DEMAND FOR PRODUCTION AND INSPECTION NO. 20:

10 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
11 COMMUNICATION by, from OR on behalf of SAFECO regarding the subject matter of ANY of the  
12 UNDERLYING ACTIONS.

13  
14 DEMAND FOR PRODUCTION AND INSPECTION NO. 21:

15 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
16 COMMUNICATION by, from OR on behalf of GREYHOUND regarding the subject matter of ANY  
17 of the UNDERLYING ACTIONS.

18  
19 DEMAND FOR PRODUCTION AND INSPECTION NO. 22:

20 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
21 COMMUNICATION by, from OR on behalf of SITA regarding the subject matter of ANY of the  
22 UNDERLYING ACTIONS.

23  
24 DEMAND FOR PRODUCTION AND INSPECTION NO. 23:

25 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
26 COMMUNICATION by, from OR on behalf of GOLDEN STATE regarding the subject matter of ANY  
27 of the UNDERLYING ACTIONS.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 24:

2 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
3 COMMUNICATION by, from OR on behalf of PULIDO regarding the subject matter of ANY of the  
4 UNDERLYING ACTIONS.

5  
6 DEMAND FOR PRODUCTION AND INSPECTION NO. 25:

7 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
8 COMMUNICATION by, from OR on behalf of PLAINTIFFS regarding the subject matter of ANY of  
9 the UNDERLYING ACTIONS.

10  
11 DEMAND FOR PRODUCTION AND INSPECTION NO. 26:

12 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
13 COMMUNICATION by, from OR on behalf of ANY PERSON not listed in Demand 16 through  
14 Demand 25 regarding the subject matter of ANY of the UNDERLYING ACTIONS.

15  
16 DEMAND FOR PRODUCTION AND INSPECTION NO. 27:

17 ALL DOCUMENTS RELATING TO the business operations of SAFECO.

18  
19 DEMAND FOR PRODUCTION AND INSPECTION NO. 28:

20 ALL DOCUMENTS RELATING TO the business operations of GREYHOUND.

21  
22 DEMAND FOR PRODUCTION AND INSPECTION NO. 29:

23 ALL DOCUMENTS RELATING TO the business operations of GOLDEN STATE.

24  
25 DEMAND FOR PRODUCTION AND INSPECTION NO. 30:

26 ALL DOCUMENTS RELATING TO the business operations of SITA.



1 DEMAND FOR PRODUCTION AND INSPECTION NO. 31:

2 ALL DOCUMENTS RELATING TO the business relationship between SITA AND  
3 GOLDEN STATE.

4  
5 DEMAND FOR PRODUCTION AND INSPECTION NO. 32:

6 ALL DOCUMENTS RELATING TO the business relationship between SITA AND ANY  
7 PERSON.

8  
9 DEMAND FOR PRODUCTION AND INSPECTION NO. 33:

10 ALL DOCUMENTS RELATING TO the business relationship between GOLDEN STATE  
11 AND ANY PERSON.

12  
13 DEMAND FOR PRODUCTION AND INSPECTION NO. 34:

14 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
15 informal, between SITA AND GOLDEN STATE RELATING TO the sharing of OR the use of  
16 buses.

17  
18 DEMAND FOR PRODUCTION AND INSPECTION NO. 35:

19 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
20 informal, between SITA AND GOLDEN STATE RELATING TO the sharing of OR the use of  
21 drivers.

22  
23 DEMAND FOR PRODUCTION AND INSPECTION NO. 36:

24 ALL DOCUMENTS RELATING TO the BUS.

25  
26 DEMAND FOR PRODUCTION AND INSPECTION NO. 37:

27 ALL DOCUMENTS RELATING TO the bankruptcy of GOLDEN STATE.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 38:

2 ALL DOCUMENTS RELATING TO ANY federal OR state indictment of GOLDEN  
3 STATE.

4  
5 DEMAND FOR PRODUCTION AND INSPECTION NO. 39:

6 ALL DOCUMENTS RELATING TO ANY criminal prosecution of GOLDEN STATE  
7 RELATING TO the ACCIDENT.

8  
9 DEMAND FOR PRODUCTION AND INSPECTION NO. 40:

10 ALL DOCUMENTS RELATING TO ANY criminal prosecution of SITA RELATING TO  
11 the ACCIDENT.

12  
13 DEMAND FOR PRODUCTION AND INSPECTION NO. 41:

14 ALL DOCUMENTS RELATING TO ANY criminal prosecution of PULIDO RELATING  
15 TO the ACCIDENT.

LexisNexis® File & Serve

Welcome: Davis, Maureen  
Morales & Gary

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[Total Litigator](#)

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[Create an Order](#) [Incomplete Orders](#) [Submitted Orders](#)

**TIP:** Use LexisNexis File & Serve to E-Serve in more of your cases. Contact a representative [online](#) or at 1-800-869-1910.

Receipt 13254567

[Print Receipt](#)

**Receipt** submitted on 12/20/2006 5:26:01 PM (ET)

Date/Time (ET)	Status
12/20/2006 5:26:05 PM	Service request has been submitted.

#### Fee Information

Fee Information	Total Recipients	Subtotal	Tax	Total
SOP Fast Service Fee (2-4 business days)	2	\$290.00	\$0.00	\$290.00
	<b>Totals</b>	<b>\$290.00</b>	<b>\$0.00</b>	<b>\$290.00</b>

#### Document List

Document Title	File Name	Conversion Status	View
U.S. District Court Central District of California Subpoena in a Civil Case	7863418_Subpoena-Greene.pdf	Converted	<a href="#">PDF version</a> <a href="#">Original version</a>
U.S. District Court Central District of California Subpoena in a Civil Case	7863503_Subpoena-Cochran.pdf	Converted	<a href="#">PDF version</a> <a href="#">Original version</a>

#### Recipients

Service Recipient	Address(es)	Description	Service Status
<i>Served</i> Greene, Broilet & Wheeler LLP - Attn: Custodian of Records	Address Type: Business 100 Wilshire Blvd., 21st Floor Santa Monica, CA 90401-1162		Pending
<i>Served</i> Cochran Cherry Givens & Smith - Attn: Custodian of Records	Address Type: Business 4929 Wilshire Blvd., Suite 1010 Los Angeles, CA 90010		Pending

#### Service Options

Service Options	Selected Option
Deadline for Service	12/27/2006
Hearing Date	
Billing Reference	AC4699

File Affidavit of Service with Court? No

Special Instructions

**Contact Information**

**Contact Information**

Name Maureen Davis

Contact Email Address mdavis@moralesgary.com

Organization Morales & Gary

Organization Address 2300 Contra Costa Blvd Ste 310  
Pleasant Hill, CA 94523-3961

Phone: (925) 288-1776

Fax: (925) 288-1856

Email: dmorales@moralesgary.com

**Assistance with Service of Process Orders**

For all questions related to your Service of Process orders,  
please call us at 1-800-644-4025 or email us at [sopsupport@lexisnexis.com](mailto:sopsupport@lexisnexis.com).  
We are available to assist you Monday through Friday, 9:00am-8:30pm ET, excluding Holidays.

E

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>LexisNexis File &amp; Serve SOP</b> <b>Maureen Davis 2300 Contra Costa Blvd</b> <b>Pleasant Hill, CA 94523-3961</b> TELEPHONE NO.: <b>9252881776</b> FAX NO. (Optional):		FOR COURT USE ONLY
UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA		
PLAINTIFF/PETITIONER: <b>INTERSTATE FIRE &amp; CASUALTY COMPANY, AN ILLINOIS CORPORATION</b> DEFENDANT/RESPONDENT: <b>PACIFIC EMPLOYERS INSURANCE COMPANY, A PENNSYLVANIA CORPORATION</b>		CASE NUMBER: <b>EDCV06-0593</b>
<b>PROOF OF SERVICE OF SUMMONS</b>		Ref. No. or File No.: <b>13254567</b>

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the (specify documents): **Subpoena in A Civil Case with Attachment**
3. a. Party served (specify name of party as shown on documents served):  
**GREENE, BROILLET & WHEELER LLP**  
b. Person served: ☒ party in item 3a ☐ other (specify name and relationship to the party named in item 3a):  
**ALAN VONGAIDER, ATTORNEY**
4. Address where the party was served:  
**100 WILSHIRE Boulevard 21ST FLOOR, SANTA MONICA, CA 90401**
5. I served the party (check proper box)
  - a. ☒ **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **12/26/2006** (2) at (time): **3:30 PM**
  - b. ☐ **by substituted service.** On (date): (2) at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - (1) ☐ **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - (2) ☐ **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - (3) ☐ **(physical address unknown)** a person of at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - (5) ☐ I attach a **declaration of diligence** stating actions taken first to attempt personal service.

Page 1 of 2



PLAINTIFF/PETITIONER: <b>INTERSTATE FIRE &amp; CASUALTY COMPANY, AN ILLINOIS CORPORATION</b>	CASE NUMBER: <b>EDCV06-0593</b>
DEFENDANT/RESPONDENT: <b>PACIFIC EMPLOYERS INSURANCE COMPANY, A PENNSYLVANIA CORPORATION</b>	

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,  
(1) on (date): (2) from (city):  
(3) ☐ with two copies of the Notice and Acknowledgment of Receipt and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgment of Receipt.) (Code Civ. Proc., § 415.30)  
(4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant
- d. ☒ On behalf of (specify):  
under the following Code of Civil Procedure section:
- |                                                                   |                                                                       |
|-------------------------------------------------------------------|-----------------------------------------------------------------------|
| <input type="checkbox"/> 416.10 (corporation)                     | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|                                                                   | <input type="checkbox"/> other                                        |

7. Person who served papers

- a. Name: **JORGE RIVERA**
- b. Address: **241 S. FIGUEROA STREET, SUITE 370, LOS ANGELES, CA 90012**
- c. Telephone number: **213-621-9999**
- d. The fee for service was: \$
- e. I am:
- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:
- (i) ☐ owner ☐ employee ☒ independent contractor
- (ii) ☒ Registration No.: **4690**
- (iii) ☒ County: **LOS ANGELES, CA**

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  
or

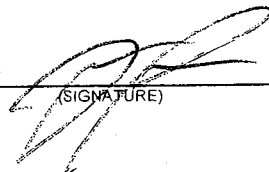
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: **12/26/2006**

**JORGE RIVERA**

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)





AO 88 (Rev.11/94) Subpoena in a Civil Case

Issued by the  
**UNITED STATES DISTRICT COURT**  
CENTRAL DISTRICT OF CALIFORNIA

INTERSTATE FIRE & CASUALTY COMPANY,  
an Illinois Corporation,  
Plaintiff,

v.

PACIFIC EMPLOYERS INSURANCE COMPANY, a  
Pennsylvania Corporation  
Defendant,

**SUBPOENA IN A CIVIL CASE**

Case Number:<sup>1</sup> EDCV06-0593 VAP (OPx)

TO: Greene, Broillet & Wheeler LLP  
100 Wilshire Blvd., 21st Floor  
Santa Monica, CA 90401-1162

- ☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Attachment A to Subpoena to Greene, Broillet & Wheeler LLP

PLACE

Greene, Broillet & Wheeler LLP  
100 Wilshire Blvd., 21st Floor Santa Monica, CA 90401-1162

DATE AND TIME

10:00 AM 1/19/2007

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

*Marilyn A. Rogers* Attorney for Defendant

12/20/06

ISSUING OFFICER'S NAME ADDRESS AND TELEPHONE NUMBER

Marilyn A. Rogers  
2300 Contra Costa Blvd., Suite 310 Pleasant Hill, CA 94523

MORALES & GARY

(925) 288-1776

(See Rule 45, Federal Rules of Civil Procedure, parts C & D on reverse)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO 88 (Rev.11/94) Subpoena in a Civil Case

**PROOF OF SERVICE**

DATE

PLACE

**SERVED**

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to

attend trial be commanded to travel from any such place within the state in which the trial is held, or the demanding party to contest the claim.

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial; the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) DUTIES IN RESPONDING TO SUBPOENA.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**ATTACHMENT A TO SUBPOENA TO GREENE, BROILLET & WHEELER LLP**

**DEFINITIONS**

1. "AND", "OR" connote the conjunctive, disjunctive, or both.
2. "EACH," "ANY," OR "ALL" means each, every, any, AND all.
3. "PERSON(S)" includes ALL people AND entities whatsoever, whether real OR juridical, incorporated OR unincorporated.
4. "RELATING TO" means constituting, concerning, discussing, depicting, referring to OR pertaining to.
5. "DOCUMENT(S)" includes without limitation correspondence, teletype messages, telegrams, contracts, agreements, memoranda, understandings, e-mails, notes, rough drawings, bulletins, circulars, diagrams, interoffice COMMUNICATIONS, books of account, tax statements, ledgers, journals, checks, check registers, passbooks, invoices, bills orders, quotations, stock certificates, financial statements, statements of account, statements of liability, balance sheets, graphs AND plans AND ANY other writing memorializing, reflecting, referring to, relating to, OR evidencing the subject of EACH DOCUMENT OR group of DOCUMENTS request. The term DOCUMENTS means the original, including ALL duplicates, copies OR drafts, ANY non-identical copy OR copies that differ from the original for ANY reason, including but not limited to, the making of notes thereon, of ANY writing AND paper, book OR record of whatever kind OR description, electronic, OR photographic OR other means, AND shall include ANY recorded, taped, filmed OR graphic matter OR phonic (e.g. ANY tape recording) OR visual reproduction OR record of ANY oral statement, conversation OR event.
6. "COMMUNICATION(S)" means ANY oral, written OR electronic transmission of information, opinion, belief, idea OR statement, including without limitation, letters OR other written correspondence, conversations, meetings, discussions, telephone calls, memoranda, notes, messages (including "e-mail," OR internal OR external text-messaging), telecopies, telexes AND facsimile transmissions.
7. "YOU" AND "YOUR" mean AND refer to Greene, Broillet & Wheeler LLP, AND

1 includes without limitation ALL predecessors, successors, affiliates, divisions, area OR regional  
2 offices, partners, employees, agents, ANY representatives of Greene, Broillet & Wheeler LLP, AND  
3 ALL PERSONS acting on behalf of ANY of the foregoing.

4 8. "UNDERLYING ACTIONS" includes without limitation ALL of the following ten  
5 actions:

6 (1). *Socorro Mendoza, et al. v. Gonzalez, Inc. dba Golden State*  
7 *Transportation, et al.*, Riverside County Superior Court, Case No. 391704;

8 (2). *Alfred Chacon, et al. v. Golden State Transportation Services, Inc., et*  
9 *al.*, Los Angeles County Superior Court, Case No. BC298227 (later filed in Riverside  
10 County Superior Court, Case No. RIC 406050);

11 (3). *Maria Delgado, et al. v. Miguel Pulido, et al.*, Riverside County  
12 Superior Court, Case No. INC 037713;

13 (4). *Arminda Gonzalez, et al. v. Golden State Transportation Services,*  
14 *Riverside County Superior Court, Case No. INC 037910;*

15 (5). *Liz Huerta, et al. v. Greyhound Lines, Inc., et al.*, Los Angeles County  
16 Superior Court, Case No. BC301249 (later filed in Riverside County Superior Court,  
17 Case No. RIC406066);

18 (6). *Jose Trinidad Romo, et al., v. SITA, Inc., et al.*, Riverside County  
19 Superior Court, Case No. INC 037382;

20 (7). *Martha Vazquez, et al. v. Miguel Pulido, et al.*, Riverside County  
21 Superior Court, Case No. INC 037708;

22 (8). *Gaspar Zaragoza v. Golden State Transportation Co., Inc., et al.*,  
23 *Riverside County Superior Court, Case No. INC 037760;*

24 (9). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, United  
25 States District Court, Central District, Case No. 2:03-CV-06041-RMT-SS; AND

26 (10). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, Riverside  
27 County Superior Court, Case No. INC 038854.  
28

1           9.       “PLAINTIFFS” means AND refers to the plaintiffs in the UNDERLYING  
2 ACTIONS, AND includes without limitation ALL agents, representatives, AND ALL PERSONS  
3 acting on behalf of ANY of the foregoing.

4           10.      “ACCIDENT” means AND refers to the accident occurred on August 24, 2002,  
5 which is the subject of the UNDERLYING ACTIONS.

6           11.      “BUS” means AND refers to the 1998 MCI Passenger Bus that was involved in the  
7 ACCIDENT.

8           12.      “PULIDO” means AND refers to Miguel Pulido, one of the defendants in the  
9 UNDERLYING ACTIONS.

10          13.      “PACIFIC EMPLOYERS” means AND refers to Pacific Employers Insurance  
11 Company AND includes without limitation ALL predecessors, successors, parent companies,  
12 subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers,  
13 employees, agents, ANY representatives of Pacific Employers Insurance Company, AND ALL  
14 PERSONS acting on behalf of ANY of the foregoing.

15          14.      “INTERSTATE” means AND refers to Interstate Fire & Casualty Company AND  
16 includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates,  
17 divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY  
18 representatives of Interstate Fire & Casualty Company, AND ALL PERSONS acting on behalf of  
19 ANY of the foregoing.

20          15.      “REPUBLIC” means AND refers to Republic Western Insurance Company AND  
21 includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates,  
22 divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY  
23 representatives of Republic Western Insurance Company, AND ALL PERSONS acting on behalf of  
24 ANY of the foregoing.

25          16.      “GREYHOUND” means AND refers to Greyhound Lines, Inc. AND includes  
26 without limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR  
27 regional offices, managing agents, directors, officers, employees, agents, ANY representatives of  
28

1 Greyhound Lines, Inc., AND ALL PERSONS acting on behalf of ANY of the foregoing.

2 17. "SAFECO" means AND refers to Safeco Credit Company AND includes without  
3 limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR regional  
4 offices, managing agents, directors, officers, employees, agents, ANY representatives of Safeco  
5 Credit Company, AND ALL PERSONS acting on behalf of ANY of the foregoing.

6 18. "GOLDEN STATE" means AND refers to Gonzales, Inc. AND Gonzales, Inc. d/b/a  
7 Golden State Transportation Co., AND includes without limitation ALL predecessors, successors,  
8 parents, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors,  
9 officers, employees, agents, ANY representatives of Gonzales, Inc. AND Gonzales, Inc. d/b/a  
10 Golden State Transportation Co., AND ALL PERSONS acting on behalf of ANY of the foregoing.

11  
12 **INSTRUCTIONS**

13 1. The DOCUMENTS OR objects subpoenaed are those DOCUMENTS OR objects in  
14 the possession OR in the control of YOU, agents, representatives, OR anyone acting for OR on  
15 YOUR behalf, regardless of whether such DOCUMENTS OR things are possessed directly by YOU  
16 OR YOUR partners, directors, officers, agents, employees, representative, investigators, OR by  
17 YOUR agents, employees, representative OR investigators.

18 2. If ANY DOCUMENT OR object is not produced on the ground that it is privileged  
19 OR otherwise claimed to be protected against production by ANY rule of law, YOU shall provide  
20 the following information with respect to EACH such DOCUMENT OR object:

- 21 (1). Its date;
- 22 (2). IDENTIFY EACH AND every author AND other PERSON who prepared OR  
23 participated in the preparation of it:
- 24 (3). IDENTIFY EACH AND every PERSON who ever received it from ANY source  
25 AND for EACH, the date it was received;
- 26 (4). IDENTIFY EACH AND every PERSON from who it was received;
- 27 (5). IDENTIFY ALL other PERSONS to whom its content were disclosed, the dates such
- 28



disclosure took place AND the means of such disclosure;

(6). The nature of the privilege OR rule of law relied upon AND the facts supporting YOUR position with respect thereto.

3. If ANY subpoenaed DOCUMENT OR object cannot be produced in full, produce it to the greatest extent possible, indicating which part of the DOCUMENT OR object has been withheld, AND the reason for it being withheld.

4. If a DOCUMENT OR object once existed, but it has been lost OR destroyed, OR otherwise is no longer in YOUR possession, IDENTIFY EACH DOCUMENT OR object AND state the following concerning its loss OR destruction:

- (1). When it was lost OR destroyed
- (2). Where it was lost OR destroyed;
- (3). IDENTIFY its last known custodian.

#### **DEMANDS FOR PRODUCTION AND INSPECTION**

##### **DEMAND FOR PRODUCTION AND INSPECTION NO. 1:**

A complete copy of YOUR files RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

##### **DEMAND FOR PRODUCTION AND INSPECTION NO. 2:**

ALL DOCUMENTS RELATING TO YOUR investigation RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

##### **DEMAND FOR PRODUCTION AND INSPECTION NO. 3:**

ALL DOCUMENTS RELATING TO ANY investigation RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.



1 DEMAND FOR PRODUCTION AND INSPECTION NO. 4:

2 ALL DOCUMENTS RELATING TO the PLAINTIFFS' damages as a result of the ACCIDENT

3  
4 DEMAND FOR PRODUCTION AND INSPECTION NO. 5:

5 ALL DOCUMENTS RELATING TO the ACCIDENT.

6  
7 DEMAND FOR PRODUCTION AND INSPECTION NO. 6:

8 ALL DOCUMENTS RELATING TO ANY reports generated by, from OR on behalf of YOU  
9 RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

10  
11 DEMAND FOR PRODUCTION AND INSPECTION NO. 7:

12 ALL DOCUMENTS RELATING TO the employment of PULIDO, including but not limited  
13 to his employment application, personnel file, driving record, history, citations, violations, AND log  
14 books.

15  
16 DEMAND FOR PRODUCTION AND INSPECTION NO. 8:

17 ALL pleadings in the UNDERLYING ACTIONS.

18  
19 DEMAND FOR PRODUCTION AND INSPECTION NO. 9:

20 ALL discovery requests AND responses in the UNDERLYING ACTIONS.

21  
22 DEMAND FOR PRODUCTION AND INSPECTION NO. 10:

23 ALL DOCUMENTS produced in the discovery of ANY of the UNDERLYING ACTIONS.

24  
25 DEMAND FOR PRODUCTION AND INSPECTION NO. 11:

26 ALL DOCUMENTS produced by ANY party to the UNDERLYING ACTIONS.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 12:

2 ALL deposition transcripts for depositions taken in ANY of the UNDERLYING ACTIONS.

4 DEMAND FOR PRODUCTION AND INSPECTION NO.13:

5 ANY witness statements taken from ANY PERSONS RELATING TO the UNDERLYING  
6 ACTIONS.

8 DEMAND FOR PRODUCTION AND INSPECTION NO. 14:

9 A copy of ALL settlement agreements AND releases for EACH of the UNDERLYING  
10 ACTIONS.

12 DEMAND FOR PRODUCTION AND INSPECTION NO. 15:

13 ALL DOCUMENTS RELATING TO the disposition, settlement OR final resolution of  
14 EACH of the UNDERLYING ACTIONS.

16 DEMAND FOR PRODUCTION AND INSPECTION NO. 16:

17 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
18 COMMUNICATION by, from OR on behalf of YOU regarding the subject matter of ANY of the  
19 UNDERLYING ACTIONS.

21 DEMAND FOR PRODUCTION AND INSPECTION NO. 17:

22 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
23 COMMUNICATION by, from OR on behalf of INTERSTATE regarding the subject matter of ANY  
24 of the UNDERLYING ACTIONS.

26 DEMAND FOR PRODUCTION AND INSPECTION NO. 18:

27 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
28

1 COMMUNICATION by, from OR on behalf of REPUBLIC regarding the subject matter of ANY of  
2 the UNDERLYING ACTIONS.

3  
4 DEMAND FOR PRODUCTION AND INSPECTION NO. 19:

5 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
6 COMMUNICATION by, from OR on behalf of PACIFIC EMPLOYERS regarding the subject matter  
7 of ANY of the UNDERLYING ACTIONS.

8  
9 DEMAND FOR PRODUCTION AND INSPECTION NO. 20:

10 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
11 COMMUNICATION by, from OR on behalf of SAFECO regarding the subject matter of ANY of the  
12 UNDERLYING ACTIONS.

13  
14 DEMAND FOR PRODUCTION AND INSPECTION NO. 21:

15 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
16 COMMUNICATION by, from OR on behalf of GREYHOUND regarding the subject matter of ANY  
17 of the UNDERLYING ACTIONS.

18  
19 DEMAND FOR PRODUCTION AND INSPECTION NO. 22:

20 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
21 COMMUNICATION by, from OR on behalf of SITA regarding the subject matter of ANY of the  
22 UNDERLYING ACTIONS.

23  
24 DEMAND FOR PRODUCTION AND INSPECTION NO. 23:

25 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
26 COMMUNICATION by, from OR on behalf of GOLDEN STATE regarding the subject matter of ANY  
27 of the UNDERLYING ACTIONS.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 24:

2 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
3 COMMUNICATION by, from OR on behalf of PULIDO regarding the subject matter of ANY of the  
4 UNDERLYING ACTIONS.

5  
6 DEMAND FOR PRODUCTION AND INSPECTION NO. 25:

7 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
8 COMMUNICATION by, from OR on behalf of PLAINTIFFS regarding the subject matter of ANY of  
9 the UNDERLYING ACTIONS.

10  
11 DEMAND FOR PRODUCTION AND INSPECTION NO. 26:

12 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
13 COMMUNICATION by, from OR on behalf of ANY PERSON not listed in Demand 16 through  
14 Demand 25 regarding the subject matter of ANY of the UNDERLYING ACTIONS.

15  
16 DEMAND FOR PRODUCTION AND INSPECTION NO. 27:

17 ALL DOCUMENTS RELATING TO the business operations of SAFECO.

18  
19 DEMAND FOR PRODUCTION AND INSPECTION NO. 28:

20 ALL DOCUMENTS RELATING TO the business operations of GREYHOUND.

21  
22 DEMAND FOR PRODUCTION AND INSPECTION NO. 29:

23 ALL DOCUMENTS RELATING TO the business operations of GOLDEN STATE.

24  
25 DEMAND FOR PRODUCTION AND INSPECTION NO. 30:

26 ALL DOCUMENTS RELATING TO the business operations of SITA.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 31:

2 ALL DOCUMENTS RELATING TO the business relationship between SITA AND  
3 GOLDEN STATE.

4  
5 DEMAND FOR PRODUCTION AND INSPECTION NO. 32:

6 ALL DOCUMENTS RELATING TO the business relationship between SITA AND ANY  
7 PERSON.

8  
9 DEMAND FOR PRODUCTION AND INSPECTION NO. 33:

10 ALL DOCUMENTS RELATING TO the business relationship between GOLDEN STATE  
11 AND ANY PERSON.

12  
13 DEMAND FOR PRODUCTION AND INSPECTION NO. 34:

14 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
15 informal, between SITA AND GOLDEN STATE RELATING TO the sharing of OR the use of  
16 buses.

17  
18 DEMAND FOR PRODUCTION AND INSPECTION NO. 35:

19 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
20 informal, between SITA AND GOLDEN STATE RELATING TO the sharing of OR the use of  
21 drivers.

22  
23 DEMAND FOR PRODUCTION AND INSPECTION NO. 36:

24 ALL DOCUMENTS RELATING TO the BUS.

25  
26 DEMAND FOR PRODUCTION AND INSPECTION NO. 37:

27 ALL DOCUMENTS RELATING TO the bankruptcy of GOLDEN STATE.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 38:

2 ALL DOCUMENTS RELATING TO ANY federal OR state indictment of GOLDEN  
3 STATE.

4  
5 DEMAND FOR PRODUCTION AND INSPECTION NO. 39:

6 ALL DOCUMENTS RELATING TO ANY criminal prosecution of GOLDEN STATE  
7 RELATING TO the ACCIDENT.

8  
9 DEMAND FOR PRODUCTION AND INSPECTION NO. 40:

10 ALL DOCUMENTS RELATING TO ANY criminal prosecution of SITA RELATING TO  
11 the ACCIDENT.

12  
13 DEMAND FOR PRODUCTION AND INSPECTION NO. 41:

14 ALL DOCUMENTS RELATING TO ANY criminal prosecution of PULIDO RELATING  
15 TO the ACCIDENT.

1 *Interstate Fire & Casualty Company, v. Pacific Employers Insurance Company*  
2 United States District Court, Central District (Riverside County)  
3 Case No. EDCV06-0593 VAP (OPx)

4 **PROOF OF SERVICE**

5 STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA

6 I am employed by the Law Offices of Morales & Gary located at 2300 Contra Costa Blvd.,  
7 Suite 310, Pleasant Hill, CA 94523. I am over the age of eighteen years and not a party to the  
8 within action.

9 On December 20, 2006, I served the document(s) described as: **SUBPOENA IN A CIVIL CASE**  
10 **TO: GREEN, BROILET & WHEELER, LLP; CHOCHRAN CHERRY GIVENS & SMITH; REPUBLIC**  
11 **WESTERN INSURANCE COMPANY; AND SISTEMA INTERNACIONAL DE TRANSPORTE DE AUTOBUSES,**  
12 **INC.** on the interested party(ies) in this action by placing a true copy thereof enclosed in a sealed  
13 envelope addressed as follows:

14 **Attorneys for Plaintiff**

15 **Interstate Fire & Casualty Company**

16 James P. Wagoner, Esq.

17 Paul J. Whitfield, Esq.

18 MCCORMICK BARSTOW SHEPPARD WAYTE & CARRUTH

19 P.O. Box 28912

20 5 River Park Place East

21 Fresno, CA 93729

22 559/433-1300

23 559/433-2300 Fax

24 ■ BY U.S. MAIL: I am "readily familiar" with the firm's practice of collection and  
25 processing correspondence for mailing. Under that practice it would be deposited with U.S.  
26 Postal Service on the same day with postage thereon fully prepaid at Pleasant Hill,  
27 California in the ordinary course of business. I am aware that on motion of the party served,  
28 service is presumed invalid if postal cancellation date or postage meter date is more than one  
day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the  
above is true and correct.

Executed on December 20, 2006, at Pleasant Hill, California.

  
Maureen Davis



LexisNexis® File & Serve

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Morales & Gary

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Receipt 13254567

[Print Receipt](#)

**Receipt** submitted on 12/20/2006 5:26:01 PM (ET)

Date/Time (ET)	Status
12/20/2006 5:26:05 PM	Service request has been submitted.

#### Fee Information

Fee Information	Total Recipients	Subtotal	Tax	Total
SOP Fast Service Fee (2-4 business days)	2	\$290.00	\$0.00	\$290.00
<b>Totals</b>		<b>\$290.00</b>	<b>\$0.00</b>	<b>\$290.00</b>

#### Document List

Document Title	File Name	Conversion Status	View
U.S. District Court Central District of California Subpoena in a Civil Case	7863418_Subpoena-Greene.pdf	Converted	<a href="#">PDF version</a> <a href="#">Original version</a>
U.S. District Court Central District of California Subpoena in a Civil Case	7863503_Subpoena-Cochran.pdf	Converted	<a href="#">PDF version</a> <a href="#">Original version</a>

#### Recipients

Service Recipient	Address(es)	Description	Service Status
Greene, Broilet & Wheeler LLP - Attn: Custodian of Records	Address Type: Business 100 Wilshire Blvd., 21st Floor Santa Monica, CA 90401-1162		Pending
Cochran Cherry Givens & Smith - Attn: Custodian of Records	Address Type: Business 4929 Wilshire Blvd., Suite 1010 Los Angeles, CA 90010		Pending

#### Service Options

Service Options	Selected Option
Deadline for Service	12/27/2006
Hearing Date	
Billing Reference	AC4699

File Affidavit of Service with Court? No

Special Instructions

**Contact Information**

**Contact Information**

Name Maureen Davis

Contact Email Address mdavis@moralesgary.com

Organization Morales & Gary

Organization Address 2300 Contra Costa Blvd Ste 310  
Pleasant Hill, CA 94523-3961

Phone: (925) 288-1776

Fax: (925) 288-1856

Email: dmorales@moralesgary.com

**Assistance with Service of Process Orders**

For all questions related to your Service of Process orders,  
please call us at 1-800-644-4025 or email us at [sopsupport@lexisnexis.com](mailto:sopsupport@lexisnexis.com).

We are available to assist you Monday through Friday, 9:00am-8:30pm ET, excluding Holidays.

Receipt 13254567

**Receipt** submitted on 12/20/2006 5:26:01 PM (ET)

Date/Time (ET)	Status
12/28/2006 2:47:00 PM	Received Signed Service Affidavit for order (Greene, Broilet & Wheeler LLP - Attn: Custodian of Records)
12/26/2006 6:30:00 PM	Successfully performed service (Greene, Broilet & Wheeler LLP - Attn: Custodian of Records)
12/21/2006 6:36:00 PM	Successfully performed service (Cochran Cherry Givens & Smith - Attn: Custodian of Records)
12/21/2006 9:06:00 PM	Received Signed Service Affidavit for order (Cochran Cherry Givens & Smith - Attn: Custodian of Records)
12/20/2006 5:26:14 PM	Order request received (Order ID 8203362,8203363)
12/20/2006 5:26:05 PM	Service request has been submitted.

**Fee Information**

Fee Information	Total Recipients	Subtotal	Tax	Total
SOP Fast Service Fee (2-4 business days)	2	\$290.00	\$0.00	\$290.00
(Credit)SOP Fast Service Fee (2-4 business days)	-2	\$-140.00	\$0.00	\$-140.00
<b>Totals</b>		<b>\$150.00</b>	<b>\$0.00</b>	<b>\$150.00</b>

**Document List**

Document Title	File Name	Conversion Status	View
U.S. District Court Central District of California Subpoena in a Civil Case	7863418_Subpoena-Greene.pdf	Converted	<a href="#">PDF format</a> <a href="#">Original format</a>
U.S. District Court Central District of California Subpoena in a Civil Case	7863503_Subpoena-Cochran.pdf	Converted	<a href="#">PDF format</a> <a href="#">Original format</a>
Signed Service Affidavit for order (Cochran Cherry Givens & Smith - Attn: Custodian of Records)	7873068_ServiceRequestConf.pdf	Converted	<a href="#">PDF format</a> <a href="#">Original format</a>
Signed Service Affidavit for order (Greene, Broilet & Wheeler LLP - Attn: Custodian of Records)	7909573_ServiceRequestConf.pdf	Converted	<a href="#">PDF format</a> <a href="#">Original format</a>

**Recipients**

Service Recipient	Address(es)	Description	Service Status
Greene, Broilet & Wheeler LLP - Attn: Custodian of Records	Address Type: Business 100 Wilshire Blvd., 21st Floor Santa Monica, CA 90401-1162		Served

Cochran Cherry Givens & Smith - Attn:  
Custodian of Records

Address Type: Business  
4929 Wilshire Blvd.,  
Suite 1010  
Los Angeles, CA 90010

Served

#### Service Options

Service Options	Selected Option
Deadline for Service	12/27/2006
Hearing Date	
Billing Reference	AC4699
File Affidavit of Service with Court?	No
Special Instructions	

#### Contact Information

Contact Information
Name Maureen Davis
Contact Email Address mdavis@moralesgary.com
Organization Morales & Gary
Organization Address 2300 Contra Costa Blvd Ste 310 Pleasant Hill, CA 94523-3961
Phone: (925) 288-1776
Fax: (925) 288-1856
Email: dmorales@moralesgary.com

F

IN THE  
UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF TEXAS

INTERSTATE FIRE & CASUALTY COMPANY,  
AN ILLINOIS CORPORATION

Plaintiff/Petitioner

vs.  
PACIFIC EMPLOYERS INSURANCE COMPANY,  
A PENNSYLVANIA CORPORATION

Defendant/Respondent

Hearing Date:

CAUSE NO:  
EDCV06-0593  
VAP (OPX)


AFFIDAVIT OF SERVICE OF:  
SUBPOENA IN A CIVIL CASE WITH ATTACHMENT

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, has the authority to serve pleadings in the State named below, and is competent to be a witness therein.

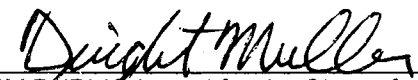
On the **5th day of January, 2007, at 12:15 PM**, at the address of **350 N ST PAUL 3RD FLOOR, DALLAS, TX 75201**; this affiant served the above described documents upon **SISTEMA INTERNACIONAL DE TRANSPORTE DE AUTOBUSES, INC., ATTN: CUSTODIAN OF RECORDS**, by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with **MARIA CERDA, SECRETARY, A Hispanic female approx. 25-30 years of age 5'4"-5'6" in height weighing 100-120 lbs with black hair.**

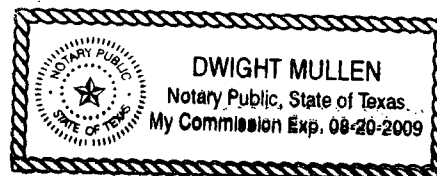
No Information was provided or discovered that indicates that the subjects served are members of the U.S. military.

DATED this **5th day of January, 2007.**

  
BREIHAN A BRIDGEWATER, Reg. # SC237, DALLAS, TX

SUBSCRIBED AND SWORN to before me this 5th day of January, 2007

  
NOTARY PUBLIC in and for the State of Texas  
Residing at: Allen, TX  
My Commission Expires: 8-20-2009



ABC's Client Name  
LexisNexis File & Serve SOP  
13254821

ORIGINAL PROOF OF  
SERVICE

ABC Tracking #: 8203364



Affidavit of Service (person and business)

Page 1 of 1

IN THE  
UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF TEXAS

INTERSTATE FIRE & CASUALTY COMPANY,  
AN ILLINOIS CORPORATION

Plaintiff/Petitioner

vs.  
PACIFIC EMPLOYERS INSURANCE COMPANY,  
A PENNSYLVANIA CORPORATION

Defendant/Respondent

Hearing Date:

CAUSE NO:  
EDCV06-0593  
YAF (PTA)

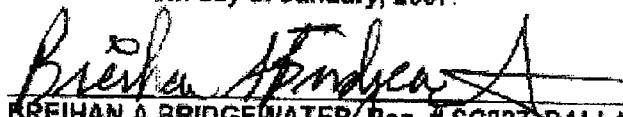
AFFIDAVIT OF SERVICE OF:  
SUBPOENA IN A CIVIL CASE WITH ATTACHMENT

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, has the authority to serve pleadings in the State named below, and is competent to be a witness therein.


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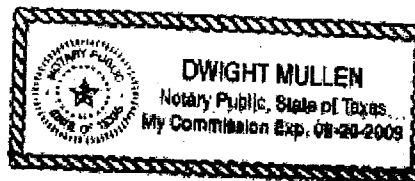
No information was provided or discovered that indicates that the subjects served are members of the U.S. military.

DATED this 5th day of January, 2007.

  
BREIHAN A BRIDGEWATER, Reg. # SC237, DALLAS, TX

SUBSCRIBED AND SWORN to before me this 5th day of January, 2007

  
NOTARY PUBLIC in and for the State of Texas  
Residing at: Allen, TX  
My Commission Expires: 8-20-2009



ABC's Client Name  
LexisNexis File & Serve SOP  
13254821

ORIGINAL PROOF OF  
SERVICE

ABC Tracking #: 8203354





AO 88 (Rev.11/94) Subpoena in a Civil Case

Issued by the  
**UNITED STATES DISTRICT COURT**  
NORTHERN DISTRICT OF TEXAS

INTERSTATE FIRE & CASUALTY COMPANY,  
an Illinois Corporation,  
Plaintiff,

v.

PACIFIC EMPLOYERS INSURANCE COMPANY, a  
Pennsylvania Corporation  
Defendant,

**SUBPOENA IN A CIVIL CASE**

Case Number:<sup>1</sup> EDCV06-0593 VAP (OPx)  
Central district of California

Custodian of Records

TO: Sistema Internacional de Transporte  
de Autobuses, Inc.  
350 N. St. Paul Street, 10th Floor  
Dallas, TX 75201

- ☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
---------------------	---------------

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):


See Attachment A to Subpoena to Sistema Internacional Del Transporte De Autobuses, Inc.

PLACE	DATE AND TIME
Sistema Internacional de Transporte de Autobuses, Inc. 350 N. St. Paul Street, 10th Floor Dallas, TX 75201	10:00 AM 1/19/2007

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
----------	---------------

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
 Attorney for defendant	1-4-07
ISSUING OFFICER'S NAME ADDRESS AND TELEPHONE NUMBER	
Marilyn A. Rogers 2300 Contra Costa Blvd., Suite 310 Pleasant Hill, CA 94523	MORALES & GARY (925) 288-1776

(See Rule 45, Federal Rules of Civil Procedure, parts C & D on reverse)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO 88 (Rev.11/94) Subpoena in a Civil Case

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---

**PROOF OF SERVICE**

---

DATE

PLACE

**SERVED**

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

---

**DECLARATION OF SERVER**

---

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

---

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to

attend trial be commanded to travel from any such place within the state in which the trial is held, or the demanding party to contest the claim.

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in who behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) DUTIES IN RESPONDING TO SUBPOENA.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**ATTACHMENT A TO SUBPOENA TO  
SISTEMA INTERNACIONAL DE TRANSPORTE DE AUTOBUSES, INC.**

**DEFINITIONS**

1. "AND", "OR" connote the conjunctive, disjunctive, or both.
2. "EACH," "ANY," OR "ALL" means each, every, any, AND all.
3. "PERSON(S)" includes ALL people AND entities whatsoever, whether real OR juridical, incorporated OR unincorporated.
4. "RELATING TO" means constituting, concerning, discussing, depicting, referring to OR pertaining to.
5. "YOU" AND "YOUR" mean AND refer to Sistema Internacional de Transporte de Autobuses, Inc., AND includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY representatives of Sistema Internacional de Transporte de Autobuses, Inc., AND ALL PERSONS acting on behalf of ANY of the foregoing.
6. "PACIFIC EMPLOYERS" means AND refers to Pacific Employers Insurance Company AND includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY representatives of Pacific Employers Insurance Company, AND ALL PERSONS acting on behalf of ANY of the foregoing.
7. "INTERSTATE" means AND refers to Interstate Fire & Casualty Company AND includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY representatives of Interstate Fire & Casualty Company, AND ALL PERSONS acting on behalf of ANY of the foregoing.
8. "REPUBLIC" means AND refers to Republic Western Insurance Company AND includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY representatives of Republic Western Insurance Company, AND ALL PERSONS acting on behalf of

1 ANY of the foregoing.

2 9. "GREYHOUND" means AND refers to Greyhound Lines, Inc., AND includes  
3 without limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR  
4 regional offices, managing agents, directors, officers, employees, agents, ANY representatives of  
5 Greyhound Lines, Inc., AND ALL PERSONS acting on behalf of ANY of the foregoing.

6 10. "SAFECO" means AND refers to Safeco Credit Company, AND includes without  
7 limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR regional  
8 offices, managing agents, directors, officers, employees, agents, ANY representatives of Safeco  
9 Credit Company, AND ALL PERSONS acting on behalf of ANY of the foregoing.

10 11. "GOLDEN STATE" means AND refers to Gonzales, Inc. AND Gonzales, Inc. d/b/a  
11 Golden State Transportation Co., AND includes without limitation ALL predecessors, successors,  
12 parents, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors,  
13 officers, employees, agents, ANY representatives of Gonzales, Inc. AND Gonzales, Inc. d/b/a  
14 Golden State Transportation Co., AND ALL PERSONS acting on behalf of ANY of the foregoing.

15 12. "VARNER & BRANDT" means AND refers to Varner & Brandt LLP, its partners,  
16 including but not limited to Brendan W. Brandt, its employees, agent(s) AND representative(s),  
17 AND ALL PERSONS acting on behalf of ANY of the foregoing.

18 13. "UNDERLYING ACTIONS" includes without limitation ALL of the following ten  
19 actions:

20 (1). *Socorro Mendoza, et al. v. Gonzalez, Inc. dba Golden State*  
21 *Transportation, et al.*, Riverside County Superior Court, Case No. 391704;

22 (2). *Alfred Chacon, et al. v. Golden State Transportation Services, Inc., et*  
23 *al.*, Los Angeles County Superior Court, Case No. BC298227 (later filed in Riverside  
24 County Superior Court, Case No. RIC 406050);

25 (3). *Maria Delgado, et al. v. Miguel Pulido, et al.*, Riverside County  
26 Superior Court, Case No. INC 037713;

27 (4). *Arminda Gonzalez, et al. v. Golden State Transportation Services,*  
28

1 Riverside County Superior Court, Case No. INC 037910;

2 (5). *Liz Huerta, et al. v. Greyhound Lines, Inc., et al.*, Los Angeles County  
3 Superior Court, Case No. BC301249 (later filed in Riverside County Superior Court,  
4 Case No. RIC406066);

5 (6). *Jose Trinidad Romo, et al., v. SITA, Inc., et al.*, Riverside County  
6 Superior Court, Case No. INC 037382;

7 (7). *Martha Vazquez, et al. v. Miguel Pulido, et al.*, Riverside County  
8 Superior Court, Case No. INC 037708;

9 (8). *Gaspar Zaragoza v. Golden State Transportation Co., Inc., et al.*,  
10 Riverside County Superior Court, Case No. INC 037760;

11 (9). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, United  
12 States District Court, Central District, Case No. CV 03-6041; AND

13 (10). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, Riverside  
14 County Superior Court, Case No. INC 038854.

15 14. "ACCIDENT" means AND refers to the accident occurred on August 24, 2002,  
16 which is the subject of the UNDERLYING ACTIONS.

17 15. "BUS" means AND refers to the 1998 MCI Passenger Bus that was involved in the  
18 ACCIDENT.

19 16. "PULIDO" means AND refers to Miguel Pulido, one of the defendants in the  
20 UNDERLYING ACTIONS.

21 17. "MASTER LEASE AGREEMENT" means AND refers to the lease agreement  
22 SAFECO AND GREYHOUND entered into on July 29, 1998 RELATING TO SAFECO's lease of  
23 "intercity motor coaches" to GREYHOUND.

24 18. "MASTER SUBLEASE AGREEMENT" means AND refers to the lease agreement  
25 GREYHOUND AND GOLDEN STATE entered into on July 31, 1998 RELATING TO  
26 GREYHOUND's sublease of "intercity motor coaches" to GOLDEN STATE

27 19. "REPUBLIC POLICIES" means AND refers to the policies issued by REPUBLIC,  
28

1 Policy Number PBA0000343-01 in effect August 31, 2001 to August 31, 2002 AND Policy  
2 Number GLP0004163 in effective May 29, 2001 to August 3, 2001.

3 20. "INTERSTATE POLICIES" means AND refers to the policy issued by  
4 INTERSTATE, Policy Number FFX6200401 in effect August 31, 2001 to August 31, 2002 AND  
5 Policy Number FFX6200400.

6 21. "PACIFIC EMPLOYERS POLICY" means AND refers to the policy issued by  
7 PACIFIC EMPLOYERS, Policy Number XSA HO8002964 in effect September 1, 2001 to  
8 September 1, 2002.

9 22. "CLAIM(S)" means ANY demand for something due OR believed to be due,  
10 including but not limited to demands for payment of moneys OR for taking ANY action whatsoever.

11 23. "COMMUNICATION(S)" means ANY oral, written OR electronic transmission of  
12 information, opinion, belief, idea OR statement, including without limitation, letters OR other  
13 written correspondence, conversations, meetings, discussions, telephone calls, memoranda, notes,  
14 messages (including "e-mail," OR internal OR external text-messaging), telecopies, telexes AND  
15 facsimile transmissions.

16 24. "DOCUMENT(S)" includes without limitation correspondence, teletype messages,  
17 telegrams, contracts, agreements, memoranda, understandings, e-mails, notes, rough drawings,  
18 bulletins, circulars, diagrams, interoffice COMMUNICATIONS, books of account, tax statements,  
19 ledgers, journals, checks, check registers, passbooks, invoices, bills orders, quotations, stock  
20 certificates, financial statements, statements of account, statements of liability, balance sheets,  
21 graphs AND plans AND ANY other writing memorializing, reflecting, referring to, RELATING  
22 TO, OR evidencing the subject of EACH DOCUMENT OR group of DOCUMENTS request. The  
23 term DOCUMENTS means the original, including ALL duplicates, copies OR drafts, ANY non-  
24 identical copy OR copies that differ from the original for ANY reason, including but not limited to,  
25 the making of notes thereon, of ANY writing AND paper, book OR record of whatever kind OR  
26 description, electronic, OR photographic OR other means, AND shall include ANY recorded, taped,  
27 filmed OR graphic matter OR phonic (e.g. ANY tape recording) OR visual reproduction OR record  
28



1 of ANY oral statement, conversation OR event.

2 25. "AUTHORITY" means AND refers to ANY governmental agency, corporation  
3 AND institution in the United States including but not limited to ALL governmental departments,  
4 ALL federal agencies, ALL state agencies, ALL county agencies, ALL city agencies, AND ALL  
5 PERSONS acting on behalf of ANY of the foregoing.

### 7 INSTRUCTIONS

8 1. The DOCUMENTS OR objects subpoenaed are those DOCUMENTS OR objects in  
9 the possession OR in the control of YOU, agents, representatives, OR anyone acting for OR on  
10 YOUR behalf, regardless of whether such DOCUMENTS OR things are possessed directly by YOU  
OR YOUR partners, directors, officers, agents, employees, representative, investigators, OR by  
YOUR agents, employees, representative OR investigators.

11 2. If ANY DOCUMENT OR object is not produced on the ground that it is privileged  
12 OR otherwise claimed to be protected against production by ANY rule of law, YOU shall provide  
the following information with respect to EACH such DOCUMENT OR object:

- 13 (1). Its date;
- 14 (2). IDENTIFY EACH AND every author AND other PERSON who prepared OR  
15 participated in the preparation of it:
- 16 (3). IDENTIFY EACH AND every PERSON who ever received it from ANY source  
AND for EACH, the date it was received;
- 17 (4). IDENTIFY EACH AND every PERSON from who it was received;
- 18 (5). IDENTIFY ALL other PERSONS to whom its content were disclosed, the dates such  
disclosure took place AND the means of such disclosure;
- 19 (6). The nature of the privilege OR rule of law relied upon AND the facts supporting  
20 YOUR position with respect thereto.

21 3. If ANY subpoenaed DOCUMENT OR object cannot be produced in full, produce it  
22 to the greatest extent possible, indicating which part of the DOCUMENT OR object has been  
withheld, AND the reason for it being withheld.

23 4. If a DOCUMENT OR object once existed, but it has been lost OR destroyed, OR  
24 otherwise is no longer in YOUR possession, IDENTIFY EACH DOCUMENT OR object AND  
state the following concerning its loss OR destruction:

- 25 (1). When it was lost OR destroyed
- 26 (2). Where it was lost OR destroyed;
- 27 (3). IDENTIFY its last known custodian.
- 28



**DEMANDS FOR PRODUCTION AND INSPECTION**

DEMAND FOR PRODUCTION AND INSPECTION NO. 1:

A complete copy of YOUR files RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

DEMAND FOR PRODUCTION AND INSPECTION NO. 2:

ALL DOCUMENTS RELATING TO the application, underwriting, OR issuing of the REPUBLIC POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 3:

ALL DOCUMENTS RELATING TO the application, underwriting, OR issuing of the INTERSTATE POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 4:

A complete copy of the REPUBLIC POLICIES including but not limited to ANY endorsements, riders, OR ANY schedule of vehicles insured under the REPUBLIC POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 5:

A complete copy of the INTERSTATE POLICIES including but not limited to ANY endorsements, riders, OR ANY schedule of vehicles insured under the INTERSTATE POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 6:

A complete copy of the PACIFIC EMPLOYERS POLICY including but not limited to ANY endorsements, riders, OR ANY schedule of vehicles insured under the PACIFIC EMPLOYERS POLICY.

DEMAND FOR PRODUCTION AND INSPECTION NO. 7:

ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY COMMUNICATION by, from OR on behalf of REPUBLIC regarding the ACCIDENT OR the UNDERLYING ACTIONS.

DEMAND FOR PRODUCTION AND INSPECTION NO. 8:

ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY

1 COMMUNICATION by, from OR on behalf of INTERSTATE regarding the ACCIDENT OR the  
2 UNDERLYING ACTIONS.

3 DEMAND FOR PRODUCTION AND INSPECTION NO. 9:

4 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
5 COMMUNICATION by, from OR on behalf of PACIFIC EMPLOYERS regarding ACCIDENT OR  
6 the UNDERLYING ACTIONS.

7 DEMAND FOR PRODUCTION AND INSPECTION NO. 10:

8 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
9 COMMUNICATION by, from OR on behalf of SAFECO regarding the ACCIDENT OR the  
10 UNDERLYING ACTIONS.

11 DEMAND FOR PRODUCTION AND INSPECTION NO. 11:

12 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
13 COMMUNICATION by, from OR on behalf of GREYHOUND regarding the ACCIDENT OR the  
14 UNDERLYING ACTIONS.

15 DEMAND FOR PRODUCTION AND INSPECTION NO. 12:

16 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
17 COMMUNICATION by, from OR on behalf of GOLDEN STATE regarding the ACCIDENT OR the  
18 UNDERLYING ACTIONS.

19 DEMAND FOR PRODUCTION AND INSPECTION NO. 13:

20 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
21 COMMUNICATION by, from OR on behalf of YOU regarding the ACCIDENT OR the  
22 UNDERLYING ACTIONS.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 14:

24 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
25 COMMUNICATION by, from OR on behalf of PULIDO regarding the ACCIDENT OR the  
26 UNDERLYING ACTIONS.

27 DEMAND FOR PRODUCTION AND INSPECTION NO. 15:

28 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY

1 COMMUNICATION by, from OR on behalf of plaintiffs in the UNDERLYING ACTIONS regarding  
2 the ACCIDENT OR the UNDERLYING ACTIONS.

3 DEMAND FOR PRODUCTION AND INSPECTION NO. 16:

4 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
5 COMMUNICATION by, from OR on behalf of VARNER & BRANDT regarding the ACCIDENT  
6 OR the UNDERLYING ACTIONS.

7 DEMAND FOR PRODUCTION AND INSPECTION NO. 17:

8 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
9 COMMUNICATION by, from OR on behalf of ANY PERSON, not identified in Demand 7 through  
10 Demand 16 regarding the ACCIDENT OR the UNDERLYING ACTIONS.

11 DEMAND FOR PRODUCTION AND INSPECTION NO. 18:

12 ALL DOCUMENTS RELATING TO the tender of ANY of the UNDERLYING ACTIONS  
13 by, from, OR on behalf of ANY PERSONS to REPUBLIC.

14 DEMAND FOR PRODUCTION AND INSPECTION NO. 19:

15 ALL DOCUMENTS RELATING TO the tender of ANY of the UNDERLYING ACTIONS  
16 by, from, OR on behalf of ANY PERSONS to INTERSTATE.

17 DEMAND FOR PRODUCTION AND INSPECTION NO. 20:

18 ALL DOCUMENTS RELATING TO the tender of ANY of the UNDERLYING ACTIONS  
19 by, from, OR on behalf of ANY PERSONS to PACIFIC EMPLOYERS.

20 DEMAND FOR PRODUCTION AND INSPECTION NO. 21:

21 ALL DOCUMENTS RELATING TO coverage for the ACCIDENT OR ANY injury, loss  
22 OR CLAIM arising out of the ACCIDENT under ANY policy.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 22:

24 ALL DOCUMENTS RELATING TO ANY denial OR reservation of rights letter(s) issued  
25 by REPUBLIC RELATING TO the UNDERLYING ACTIONS.

26  
27 /////

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 23:

2 ALL DOCUMENTS RELATING TO ANY denial OR reservation of rights letter(s) issued  
3 by INTERSTATE RELATING TO the UNDERLYING ACTIONS.

4 DEMAND FOR PRODUCTION AND INSPECTION NO. 24:

5 ALL pleadings in the UNDERLYING ACTIONS.

6 DEMAND FOR PRODUCTION AND INSPECTION NO. 25:

7 ALL discovery requests AND responses in the UNDERLYING ACTIONS.

8 DEMAND FOR PRODUCTION AND INSPECTION NO. 26:

9 ALL DOCUMENTS produced in the discovery of ANY of the UNDERLYING ACTIONS.

10 DEMAND FOR PRODUCTION AND INSPECTION NO. 27:

11 ALL DOCUMENTS produced by ANY party to the UNDERLYING ACTIONS.

12 DEMAND FOR PRODUCTION AND INSPECTION NO. 28:

13 ALL deposition transcripts for depositions taken in ANY of the UNDERLYING ACTIONS.

14 DEMAND FOR PRODUCTION AND INSPECTION NO. 29:

15 ANY witness statements taken from ANY PERSONS RELATING TO the UNDERLYING  
16 ACTIONS.

17 DEMAND FOR PRODUCTION AND INSPECTION NO. 30:

18 A copy of ALL settlement agreements AND releases for EACH of the UNDERLYING  
19 ACTIONS.

20 DEMAND FOR PRODUCTION AND INSPECTION NO. 31:

21 ALL DOCUMENTS RELATING TO the disposition, settlement OR final resolution of  
22 EACH of the UNDERLYING ACTIONS.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 32:

24 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
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1 informal, between SAFECO AND GREYHOUND RELATING TO the leasing of vehicles  
2 including but not limited to the MASTER LEASE AGREEMENT in effect during the time period  
3 of January of 1998 through January of 2003.

4 DEMAND FOR PRODUCTION AND INSPECTION NO. 33:

5 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
6 informal, between GREYHOUND AND GOLDEN STATE RELATING TO the leasing of vehicles  
7 including but not limited to the MASTER SUBLEASE AGREEMENT in effect during the time period  
8 of January of 1998 through January of 2003.

9 DEMAND FOR PRODUCTION AND INSPECTION NO. 34:

10 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
11 informal, between SAFECO AND GOLDEN STATE RELATING TO the leasing of vehicles in effect  
12 during the time period of January of 1998 through January of 2003.

13 DEMAND FOR PRODUCTION AND INSPECTION NO. 35:

14 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
15 informal, between GREYHOUND AND YOU RELATING TO the leasing of vehicles including but  
16 not limited to the MASTER SUBLEASE AGREEMENT in effect during the time period of January  
17 of 1998 through January of 2003.

18 DEMAND FOR PRODUCTION AND INSPECTION NO. 36:

19 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
20 informal, between SAFECO AND YOU RELATING TO the leasing of vehicles including but not  
21 limited to the MASTER SUBLEASE AGREEMENT in effect during the time period of January of 1998  
22 through January of 2003.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 37:

24 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
25 informal, between YOU AND GOLDEN STATE RELATING TO the leasing of vehicles in effect  
26 during the time period of January of 1998 through January of 2003.

27 DEMAND FOR PRODUCTION AND INSPECTION NO. 38:

28 ALL DOCUMENTS RELATING TO the termination of the MASTER LEASE  
AGREEMENT OR MASTER SUBLEASE AGREEMENT.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 39:

2 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
3 informal, between YOU AND GOLDEN STATE RELATING TO the sharing of OR the use of  
4 buses for the time period of January of 1998 through January of 2003.

5 DEMAND FOR PRODUCTION AND INSPECTION NO. 40:

6 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
7 informal, between YOU AND GOLDEN STATE RELATING TO the sharing of OR the use of  
8 drivers for the time period of January of 1998 through January of 2003.

9 DEMAND FOR PRODUCTION AND INSPECTION NO. 41:

10 Complete copies of ALL Securities and Exchange Commission filings AND annual reports  
11 by, from OR on behalf of YOU during the time period of December 31, 2001 to January 1, 2003.

12 DEMAND FOR PRODUCTION AND INSPECTION NO. 42:

13 Complete copies of ALL Securities and Exchange Commission filings AND annual reports  
14 by, from OR on behalf of GOLDEN STATE during the time period of December 31, 2001 to  
15 January 1, 2003.

16 DEMAND FOR PRODUCTION AND INSPECTION NO. 43:

17 Complete copies of ALL Securities and Exchange Commission filings AND annual reports  
18 by, from OR on behalf of GREYHOUND during the time period of December 31, 2001 to January  
19 1, 2003.

20 DEMAND FOR PRODUCTION AND INSPECTION NO. 44:

21 ALL DOCUMENTS RELATING TO the operations OR involvement of GOLDEN STATE  
22 RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 45:

24 ALL DOCUMENTS RELATING TO YOUR operations OR involvement RELATING TO  
25 the ACCIDENT OR the UNDERLYING ACTIONS.

26 DEMAND FOR PRODUCTION AND INSPECTION NO. 46:

27 ALL DOCUMENTS RELATING TO YOUR use of the BUS for the time period of July of  
28 2002 through October of 2002.



1 DEMAND FOR PRODUCTION AND INSPECTION NO. 47:

2 ALL DOCUMENTS RELATING TO GOLDEN STATE's use of the BUS for the time  
3 period of July of 2002 through October of 2002.

4 DEMAND FOR PRODUCTION AND INSPECTION NO. 48:

5 ALL DOCUMENTS RELATING TO the BUS for the time period of July of 2002 through  
6 October of 2002 including but not limited to the records of operation, federal registration, state  
7 registration, AND title.

8 DEMAND FOR PRODUCTION AND INSPECTION NO. 49:

9 ALL DOCUMENTS filed with ANY AUTHORITY RELATING TO GOLDEN STATE's  
10 operation of the BUS during the year of 2002.

11 DEMAND FOR PRODUCTION AND INSPECTION NO. 50:

12 ALL DOCUMENTS filed with ANY AUTHORITY RELATING TO YOUR operation of  
13 the BUS during the year of 2002.

14 DEMAND FOR PRODUCTION AND INSPECTION NO. 51:

15 ANY filing of insurance by OR on behalf of YOU with ANY AUTHORITY during the year  
16 of 2002 including but not limited to the Department of Transportation AND the State of California.

17 DEMAND FOR PRODUCTION AND INSPECTION NO. 52:

18 ALL DOCUMENTS RELATING TO the bankruptcy of GOLDEN STATE.

19  
20 DEMAND FOR PRODUCTION AND INSPECTION NO. 53:

21 ALL DOCUMENTS RELATING TO ANY federal OR state indictment of GOLDEN  
22 STATE for the time period of 1998 through 2004.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 54:

24 ALL DOCUMENTS RELATING TO ANY criminal prosecution against GOLDEN STATE  
25 RELATING TO the ACCIDENT.

26 DEMAND FOR PRODUCTION AND INSPECTION NO. 55:

27 ALL DOCUMENTS RELATING TO ANY criminal prosecution against YOU RELATING  
28



1 TO the ACCIDENT.

2  
3 DEMAND FOR PRODUCTION AND INSPECTION NO. 56:

4 ALL DOCUMENTS RELATING TO ANY criminal prosecution against PULIDO  
5 RELATING TO the ACCIDENT.

6 DEMAND FOR PRODUCTION AND INSPECTION NO. 57:

7 ALL DOCUMENTS RELATING TO the employment of PULIDO including but not limited  
8 to his employment application, personnel file, driving record, driving history, citations, AND  
9 violations.

10 DEMAND FOR PRODUCTION AND INSPECTION NO. 55:

11 A complete copy of PULIDO's log book for the time period of January 1, 2002 through  
12 September 1, 2002.  
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1 *Interstate Fire & Casualty Company, v. Pacific Employers Insurance Company*  
2 United States District Court, Central District (Riverside County)  
3 Case No. EDCV06-0593 VAP (OPx)

4 **PROOF OF SERVICE**

5 STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA

6 I am employed by the Law Offices of Morales & Gary located at 2300 Contra Costa Blvd.,  
7 Suite 310, Pleasant Hill, CA 94523. I am over the age of eighteen years and not a party to the  
8 within action.

9 On January 5, 2007, I served the document(s) described as: **SUBPOENA IN A CIVIL CASE** on  
10 the interested party(ies) in this action by placing a true copy thereof enclosed in a sealed envelope  
11 addressed as follows:

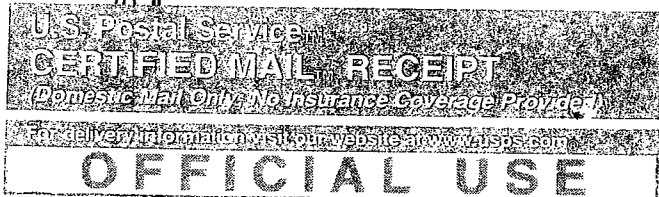
12 **Attorneys for Plaintiff**  
13 **Interstate Fire & Casualty Company**  
14 James P. Wagoner, Esq.  
15 Paul J. Whitfield, Esq.  
16 MCCORMICK BARSTOW SHEPPARD WAYTE & CARRUTH  
17 P.O. Box 28912  
18 5 River Park Place East  
19 Fresno, CA 93729  
20 559/433-1300  
559/433-2300 Fax

21 ■ BY U.S. MAIL: I am "readily familiar" with the firm's practice of collection and  
22 processing correspondence for mailing. Under that practice it would be deposited with U.S.  
23 Postal Service on the same day with postage thereon fully prepaid at Pleasant Hill,  
24 California in the ordinary course of business. I am aware that on motion of the party served,  
25 service is presumed invalid if postal cancellation date or postage meter date is more than one  
26 day after date of deposit for mailing in affidavit.

27 I declare under penalty of perjury under the laws of the State of California that the  
28 above is true and correct.

29 at Pleasant Hill, California.

30 *Maureen Davis*  
Maureen Davis



Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark  
Here

1/4/07

Sent To	SITA
Street, Apt. No., or PO Box No.	
City, State, ZIP+4	

AO 88 (Rev.11/94) Subpoena in a Civil Case

Issued by the  
**UNITED STATES DISTRICT COURT**  
NORTHERN DISTRICT OF TEXAS

INTERSTATE FIRE & CASUALTY COMPANY,  
an Illinois Corporation,  
Plaintiff,

v.

PACIFIC EMPLOYERS INSURANCE COMPANY, a  
Pennsylvania Corporation  
Defendant,

**SUBPOENA IN A CIVIL CASE**

Case Number:<sup>1</sup> EDCV06-0593 VAP (OPx)

Central District of California

Attn: Custodian of Records  
TO: Sistema Internacional de Transporte  
de Autobuses, Inc.  
600 Six Flags Drive, Suite 300  
Arlington, TX 76011

- ☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Attachment A to Subpoena to Sistema Internacional Del Transporte De Autobuses, Inc.

PLACE

Sistema Internacional de Transporte de Autobuses, Inc.  
600 Six Flags Drive, Suite 300 Arlington, TX 76011

DATE AND TIME

10:00 AM 1/19/2007

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME ADDRESS AND TELEPHONE NUMBER

Marilyn A. Rogers  
2300 Contra Costa Blvd., Suite 310 Pleasant Hill, CA 94523

MORALES & GARY

(925) 288-1776

(See Rule 45, Federal Rules of Civil Procedure, parts C & D on reverse)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO 88 (Rev.11/94) Subpoena in a Civil Case

**PROOF OF SERVICE**

DATE

PLACE

**SERVED**

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to comply production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to

attend trial be commanded to travel from any such place within the state in which the trial is held, or the demanding party to contest the claim.

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in who behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) DUTIES IN RESPONDING TO SUBPOENA.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**ATTACHMENT A TO SUBPOENA TO**  
**SISTEMA INTERNACIONAL DE TRANSPORTE DE AUTOBUSES, INC.**

**DEFINITIONS**

1. "AND", "OR" connote the conjunctive, disjunctive, or both.
2. "EACH," "ANY," OR "ALL" means each, every, any, AND all.
3. "PERSON(S)" includes ALL people AND entities whatsoever, whether real OR  
juridical, incorporated OR unincorporated.
4. "RELATING TO" means constituting, concerning, discussing, depicting, referring to  
OR pertaining to.
5. "YOU" AND "YOUR" mean AND refer to Sistema Internacional de Transporte de  
Autobuses, Inc., AND includes without limitation ALL predecessors, successors, parent companies,  
subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers,  
employees, agents, ANY representatives of Sistema Internacional de Transporte de Autobuses, Inc.,  
AND ALL PERSONS acting on behalf of ANY of the foregoing.
6. "PACIFIC EMPLOYERS" means AND refers to Pacific Employers Insurance  
Company AND includes without limitation ALL predecessors, successors, parent companies,  
subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors, officers,  
employees, agents, ANY representatives of Pacific Employers Insurance Company, AND ALL  
PERSONS acting on behalf of ANY of the foregoing.
7. "INTERSTATE" means AND refers to Interstate Fire & Casualty Company AND  
includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates,  
divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY  
representatives of Interstate Fire & Casualty Company, AND ALL PERSONS acting on behalf of  
ANY of the foregoing.
8. "REPUBLIC" means AND refers to Republic Western Insurance Company AND  
includes without limitation ALL predecessors, successors, parent companies, subsidiaries, affiliates,  
divisions, area OR regional offices, managing agents, directors, officers, employees, agents, ANY  
representatives of Republic Western Insurance Company, AND ALL PERSONS acting on behalf of

1 ANY of the foregoing.

2 9. "GREYHOUND" means AND refers to Greyhound Lines, Inc., AND includes  
3 without limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR  
4 regional offices, managing agents, directors, officers, employees, agents, ANY representatives of  
5 Greyhound Lines, Inc., AND ALL PERSONS acting on behalf of ANY of the foregoing.

6 10. "SAFECO" means AND refers to Safeco Credit Company, AND includes without  
7 limitation ALL predecessors, successors, parents, subsidiaries, affiliates, divisions, area OR regional  
8 offices, managing agents, directors, officers, employees, agents, ANY representatives of Safeco  
9 Credit Company, AND ALL PERSONS acting on behalf of ANY of the foregoing.

10 11. "GOLDEN STATE" means AND refers to Gonzales, Inc. AND Gonzales, Inc. d/b/a  
11 Golden State Transportation Co., AND includes without limitation ALL predecessors, successors,  
12 parents, subsidiaries, affiliates, divisions, area OR regional offices, managing agents, directors,  
13 officers, employees, agents, ANY representatives of Gonzales, Inc. AND Gonzales, Inc. d/b/a  
14 Golden State Transportation Co., AND ALL PERSONS acting on behalf of ANY of the foregoing.

15 12. "VARNER & BRANDT" means AND refers to Varner & Brandt LLP, its partners,  
16 including but not limited to Brendan W. Brandt, its employees, agent(s) AND representative(s),  
17 AND ALL PERSONS acting on behalf of ANY of the foregoing.

18 13. "UNDERLYING ACTIONS" includes without limitation ALL of the following ten  
19 actions:

20 (1). *Socorro Mendoza, et al. v. Gonzalez, Inc. dba Golden State*  
21 *Transportation, et al.*, Riverside County Superior Court, Case No. 391704;

22 (2). *Alfred Chacon, et al. v. Golden State Transportation Services, Inc., et*  
23 *al.*, Los Angeles County Superior Court, Case No. BC298227 (later filed in Riverside  
24 County Superior Court, Case No. RIC 406050);

25 (3). *Maria Delgado, et al. v. Miguel Pulido, et al.*, Riverside County  
26 Superior Court, Case No. INC 037713;

27 (4). *Arminda Gonzalez, et al. v. Golden State Transportation Services,*  
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1 Riverside County Superior Court, Case No. INC 037910;

2 (5). *Liz Huerta, et al. v. Greyhound Lines, Inc., et al.*, Los Angeles County  
3 Superior Court, Case No. BC301249 (later filed in Riverside County Superior Court,  
4 Case No. RIC406066);

5 (6). *Jose Trinidad Romo, et al. v. SITA, Inc., et al.*, Riverside County  
6 Superior Court, Case No. INC 037382;

7 (7). *Martha Vazquez, et al. v. Miguel Pulido, et al.*, Riverside County  
8 Superior Court, Case No. INC 037708;

9 (8). *Gaspar Zaragoza v. Golden State Transportation Co., Inc., et al.*,  
10 Riverside County Superior Court, Case No. INC 037760;

11 (9). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, United  
12 States District Court, Central District, Case No. CV 03-6041; AND

13 (10). *Juan Montero, et al. v. Golden State Bus Lines, Inc., et al.*, Riverside  
14 County Superior Court, Case No. INC 038854.

15 14. "ACCIDENT" means AND refers to the accident occurred on August 24, 2002,  
16 which is the subject of the UNDERLYING ACTIONS.

17 15. "BUS" means AND refers to the 1998 MCI Passenger Bus that was involved in the  
18 ACCIDENT.

19 16. "PULIDO" means AND refers to Miguel Pulido, one of the defendants in the  
20 UNDERLYING ACTIONS.

21 17. "MASTER LEASE AGREEMENT" means AND refers to the lease agreement  
22 SAFECO AND GREYHOUND entered into on July 29, 1998 RELATING TO SAFECO's lease of  
23 "intercity motor coaches" to GREYHOUND.

24 18. "MASTER SUBLEASE AGREEMENT" means AND refers to the lease agreement  
25 GREYHOUND AND GOLDEN STATE entered into on July 31, 1998 RELATING TO  
26 GREYHOUND's sublease of "intercity motor coaches" to GOLDEN STATE

27 19. "REPUBLIC POLICIES" means AND refers to the policies issued by REPUBLIC,  
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1 Policy Number PBA0000343-01 in effect August 31, 2001 to August 31, 2002 AND Policy  
2 Number GLP0004163 in effective May 29, 2001 to August 3, 2001.

3 20. "INTERSTATE POLICIES" means AND refers to the policy issued by  
4 INTERSTATE, Policy Number FFX6200401 in effect August 31, 2001 to August 31, 2002 AND  
5 Policy Number FFX6200400.

6 21. "PACIFIC EMPLOYERS POLICY" means AND refers to the policy issued by  
7 PACIFIC EMPLOYERS, Policy Number XSA HO8002964 in effect September 1, 2001 to  
8 September 1, 2002.

9 22. "CLAIM(S)" means ANY demand for something due OR believed to be due,  
10 including but not limited to demands for payment of moneys OR for taking ANY action whatsoever.

11 23. "COMMUNICATION(S)" means ANY oral, written OR electronic transmission of  
12 information, opinion, belief, idea OR statement, including without limitation, letters OR other  
13 written correspondence, conversations, meetings, discussions, telephone calls, memoranda, notes,  
14 messages (including "e-mail," OR internal OR external text-messaging), telecopies, telexes AND  
15 facsimile transmissions.

16 24. "DOCUMENT(S)" includes without limitation correspondence, teletype messages,  
17 telegrams, contracts, agreements, memoranda, understandings, e-mails, notes, rough drawings,  
18 bulletins, circulars, diagrams, interoffice COMMUNICATIONS, books of account, tax statements,  
19 ledgers, journals, checks, check registers, passbooks, invoices, bills orders, quotations, stock  
20 certificates, financial statements, statements of account, statements of liability, balance sheets,  
21 graphs AND plans AND ANY other writing memorializing, reflecting, referring to, RELATING  
22 TO, OR evidencing the subject of EACH DOCUMENT OR group of DOCUMENTS request. The  
23 term DOCUMENTS means the original, including ALL duplicates, copies OR drafts, ANY non-  
24 identical copy OR copies that differ from the original for ANY reason, including but not limited to,  
25 the making of notes thereon, of ANY writing AND paper, book OR record of whatever kind OR  
26 description, electronic, OR photographic OR other means, AND shall include ANY recorded, taped,  
27 filmed OR graphic matter OR phonic (e.g. ANY tape recording) OR visual reproduction OR record  
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1 of ANY oral statement, conversation OR event.

2 25. "AUTHORITY" means AND refers to ANY governmental agency, corporation  
3 AND institution in the United States including but not limited to ALL governmental departments,  
4 ALL federal agencies, ALL state agencies, ALL county agencies, ALL city agencies, AND ALL  
5 PERSONS acting on behalf of ANY of the foregoing.

### 7 INSTRUCTIONS

8 1. The DOCUMENTS OR objects subpoenaed are those DOCUMENTS OR objects in  
9 the possession OR in the control of YOU, agents, representatives, OR anyone acting for OR on  
10 YOUR behalf, regardless of whether such DOCUMENTS OR things are possessed directly by YOU  
OR YOUR partners, directors, officers, agents, employees, representative, investigators, OR by  
YOUR agents, employees, representative OR investigators.

11 2. If ANY DOCUMENT OR object is not produced on the ground that it is privileged  
12 OR otherwise claimed to be protected against production by ANY rule of law, YOU shall provide  
the following information with respect to EACH such DOCUMENT OR object:

- 13 (1). Its date;
- 14 (2). IDENTIFY EACH AND every author AND other PERSON who prepared OR  
15 participated in the preparation of it;
- 16 (3). IDENTIFY EACH AND every PERSON who ever received it from ANY source  
AND for EACH, the date it was received;
- 17 (4). IDENTIFY EACH AND every PERSON from who it was received;
- 18 (5). IDENTIFY ALL other PERSONS to whom its content were disclosed, the dates such  
19 disclosure took place AND the means of such disclosure;
- 20 (6). The nature of the privilege OR rule of law relied upon AND the facts supporting  
YOUR position with respect thereto.

21 3. If ANY subpoenaed DOCUMENT OR object cannot be produced in full, produce it  
22 to the greatest extent possible, indicating which part of the DOCUMENT OR object has been  
withheld, AND the reason for it being withheld.

23 4. If a DOCUMENT OR object once existed, but it has been lost OR destroyed, OR  
24 otherwise is no longer in YOUR possession, IDENTIFY EACH DOCUMENT OR object AND  
state the following concerning its loss OR destruction:

- 25 (1). When it was lost OR destroyed
- 26 (2). Where it was lost OR destroyed;
- 27 (3). IDENTIFY its last known custodian.

**DEMANDS FOR PRODUCTION AND INSPECTION**

DEMAND FOR PRODUCTION AND INSPECTION NO. 1:

A complete copy of YOUR files RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

DEMAND FOR PRODUCTION AND INSPECTION NO. 2:

ALL DOCUMENTS RELATING TO the application, underwriting, OR issuing of the REPUBLIC POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 3:

ALL DOCUMENTS RELATING TO the application, underwriting, OR issuing of the INTERSTATE POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 4:

A complete copy of the REPUBLIC POLICIES including but not limited to ANY endorsements, riders, OR ANY schedule of vehicles insured under the REPUBLIC POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 5:

A complete copy of the INTERSTATE POLICIES including but not limited to ANY endorsements, riders, OR ANY schedule of vehicles insured under the INTERSTATE POLICIES.

DEMAND FOR PRODUCTION AND INSPECTION NO. 6:

A complete copy of the PACIFIC EMPLOYERS POLICY including but not limited to ANY endorsements, riders, OR ANY schedule of vehicles insured under the PACIFIC EMPLOYERS POLICY.

DEMAND FOR PRODUCTION AND INSPECTION NO. 7:

ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY COMMUNICATION by, from OR on behalf of REPUBLIC regarding the ACCIDENT OR the UNDERLYING ACTIONS.

DEMAND FOR PRODUCTION AND INSPECTION NO. 8:

ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY

1 COMMUNICATION by, from OR on behalf of INTERSTATE regarding the ACCIDENT OR the  
2 UNDERLYING ACTIONS.

3 DEMAND FOR PRODUCTION AND INSPECTION NO. 9:

4 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
5 COMMUNICATION by, from OR on behalf of PACIFIC EMPLOYERS regarding ACCIDENT OR  
6 the UNDERLYING ACTIONS.

7 DEMAND FOR PRODUCTION AND INSPECTION NO. 10:

8 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
9 COMMUNICATION by, from OR on behalf of SAFECO regarding the ACCIDENT OR the  
10 UNDERLYING ACTIONS.

11 DEMAND FOR PRODUCTION AND INSPECTION NO. 11:

12 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
13 COMMUNICATION by, from OR on behalf of GREYHOUND regarding the ACCIDENT OR the  
14 UNDERLYING ACTIONS.

15 DEMAND FOR PRODUCTION AND INSPECTION NO. 12:

16 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
17 COMMUNICATION by, from OR on behalf of GOLDEN STATE regarding the ACCIDENT OR the  
18 UNDERLYING ACTIONS.

19 DEMAND FOR PRODUCTION AND INSPECTION NO. 13:

20 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
21 COMMUNICATION by, from OR on behalf of YOU regarding the ACCIDENT OR the  
22 UNDERLYING ACTIONS.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 14:

24 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
25 COMMUNICATION by, from OR on behalf of PULIDO regarding the ACCIDENT OR the  
26 UNDERLYING ACTIONS.

27 DEMAND FOR PRODUCTION AND INSPECTION NO. 15:

28 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY

1 COMMUNICATION by, from OR on behalf of plaintiffs in the UNDERLYING ACTIONS regarding  
2 the ACCIDENT OR the UNDERLYING ACTIONS.

3 DEMAND FOR PRODUCTION AND INSPECTION NO. 16:

4 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
5 COMMUNICATION by, from OR on behalf of VARNER & BRANDT regarding the ACCIDENT  
6 OR the UNDERLYING ACTIONS.

7 DEMAND FOR PRODUCTION AND INSPECTION NO. 17:

8 ALL DOCUMENTS, whether in written OR computerized form, RELATING TO ANY  
9 COMMUNICATION by, from OR on behalf of ANY PERSON, not identified in Demand 7 through  
10 Demand 16 regarding the ACCIDENT OR the UNDERLYING ACTIONS.

11 DEMAND FOR PRODUCTION AND INSPECTION NO. 18:

12 ALL DOCUMENTS RELATING TO the tender of ANY of the UNDERLYING ACTIONS  
13 by, from, OR on behalf of ANY PERSONS to REPUBLIC.

14 DEMAND FOR PRODUCTION AND INSPECTION NO. 19:

15 ALL DOCUMENTS RELATING TO the tender of ANY of the UNDERLYING ACTIONS  
16 by, from, OR on behalf of ANY PERSONS to INTERSTATE.

17 DEMAND FOR PRODUCTION AND INSPECTION NO. 20:

18 ALL DOCUMENTS RELATING TO the tender of ANY of the UNDERLYING ACTIONS  
19 by, from, OR on behalf of ANY PERSONS to PACIFIC EMPLOYERS.

20 DEMAND FOR PRODUCTION AND INSPECTION NO. 21:

21 ALL DOCUMENTS RELATING TO coverage for the ACCIDENT OR ANY injury, loss  
22 OR CLAIM arising out of the ACCIDENT under ANY policy.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 22:

24 ALL DOCUMENTS RELATING TO ANY denial OR reservation of rights letter(s) issued  
25 by REPUBLIC RELATING TO the UNDERLYING ACTIONS.

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1 DEMAND FOR PRODUCTION AND INSPECTION NO. 23:

2 ALL DOCUMENTS RELATING TO ANY denial OR reservation of rights letter(s) issued  
3 by INTERSTATE RELATING TO the UNDERLYING ACTIONS.

4 DEMAND FOR PRODUCTION AND INSPECTION NO. 24:

5 ALL pleadings in the UNDERLYING ACTIONS.

6 DEMAND FOR PRODUCTION AND INSPECTION NO. 25:

7 ALL discovery requests AND responses in the UNDERLYING ACTIONS.  
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9 DEMAND FOR PRODUCTION AND INSPECTION NO. 26:

10 ALL DOCUMENTS produced in the discovery of ANY of the UNDERLYING ACTIONS.  
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12 DEMAND FOR PRODUCTION AND INSPECTION NO. 27:

13 ALL DOCUMENTS produced by ANY party to the UNDERLYING ACTIONS.

14 DEMAND FOR PRODUCTION AND INSPECTION NO. 28:

15 ALL deposition transcripts for depositions taken in ANY of the UNDERLYING ACTIONS.  
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17 DEMAND FOR PRODUCTION AND INSPECTION NO. 29:

18 ANY witness statements taken from ANY PERSONS RELATING TO the UNDERLYING  
19 ACTIONS.

20 DEMAND FOR PRODUCTION AND INSPECTION NO. 30:

21 A copy of ALL settlement agreements AND releases for EACH of the UNDERLYING  
22 ACTIONS.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 31:

24 ALL DOCUMENTS RELATING TO the disposition, settlement OR final resolution of  
25 EACH of the UNDERLYING ACTIONS.

26 DEMAND FOR PRODUCTION AND INSPECTION NO. 32:

27 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
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1 informal, between SAFECO AND GREYHOUND RELATING TO the leasing of vehicles  
2 including but not limited to the MASTER LEASE AGREEMENT in effect during the time period  
3 of January of 1998 through January of 2003.

4 DEMAND FOR PRODUCTION AND INSPECTION NO. 33:

5 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
6 informal, between GREYHOUND AND GOLDEN STATE RELATING TO the leasing of vehicles  
7 including but not limited to the MASTER SUBLEASE AGREEMENT in effect during the time period  
8 of January of 1998 through January of 2003.

9 DEMAND FOR PRODUCTION AND INSPECTION NO. 34:

10 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
11 informal, between SAFECO AND GOLDEN STATE RELATING TO the leasing of vehicles in effect  
12 during the time period of January of 1998 through January of 2003.

13 DEMAND FOR PRODUCTION AND INSPECTION NO. 35:

14 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
15 informal, between GREYHOUND AND YOU RELATING TO the leasing of vehicles including but  
16 not limited to the MASTER SUBLEASE AGREEMENT in effect during the time period of January  
17 of 1998 through January of 2003.

18 DEMAND FOR PRODUCTION AND INSPECTION NO. 36:

19 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
20 informal, between SAFECO AND YOU RELATING TO the leasing of vehicles including but not  
21 limited to the MASTER SUBLEASE AGREEMENT in effect during the time period of January of 1998  
22 through January of 2003.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 37:

24 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
25 informal, between YOU AND GOLDEN STATE RELATING TO the leasing of vehicles in effect  
26 during the time period of January of 1998 through January of 2003.

27 DEMAND FOR PRODUCTION AND INSPECTION NO. 38:

28 ALL DOCUMENTS RELATING TO the termination of the MASTER LEASE  
AGREEMENT OR MASTER SUBLEASE AGREEMENT.



1 DEMAND FOR PRODUCTION AND INSPECTION NO. 39:

2 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
3 informal, between YOU AND GOLDEN STATE RELATING TO the sharing of OR the use of  
4 buses for the time period of January of 1998 through January of 2003.

5 DEMAND FOR PRODUCTION AND INSPECTION NO. 40:

6 ALL DOCUMENTS RELATING TO ANY agreement, whether written, oral, formal OR  
7 informal, between YOU AND GOLDEN STATE RELATING TO the sharing of OR the use of  
8 drivers for the time period of January of 1998 through January of 2003.

9 DEMAND FOR PRODUCTION AND INSPECTION NO. 41:

10 Complete copies of ALL Securities and Exchange Commission filings AND annual reports  
11 by, from OR on behalf of YOU during the time period of December 31, 2001 to January 1, 2003.

12 DEMAND FOR PRODUCTION AND INSPECTION NO. 42:

13 Complete copies of ALL Securities and Exchange Commission filings AND annual reports  
14 by, from OR on behalf of GOLDEN STATE during the time period of December 31, 2001 to  
15 January 1, 2003.

16 DEMAND FOR PRODUCTION AND INSPECTION NO. 43:

17 Complete copies of ALL Securities and Exchange Commission filings AND annual reports  
18 by, from OR on behalf of GREYHOUND during the time period of December 31, 2001 to January  
19 1, 2003.

20 DEMAND FOR PRODUCTION AND INSPECTION NO. 44:

21 ALL DOCUMENTS RELATING TO the operations OR involvement of GOLDEN STATE  
22 RELATING TO the ACCIDENT OR the UNDERLYING ACTIONS.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 45:

24 ALL DOCUMENTS RELATING TO YOUR operations OR involvement RELATING TO  
25 the ACCIDENT OR the UNDERLYING ACTIONS.

26 DEMAND FOR PRODUCTION AND INSPECTION NO. 46:

27 ALL DOCUMENTS RELATING TO YOUR use of the BUS for the time period of July of  
28 2002 through October of 2002.

1 DEMAND FOR PRODUCTION AND INSPECTION NO. 47:

2 ALL DOCUMENTS RELATING TO GOLDEN STATE's use of the BUS for the time  
3 period of July of 2002 through October of 2002.

4 DEMAND FOR PRODUCTION AND INSPECTION NO. 48:

5 ALL DOCUMENTS RELATING TO the BUS for the time period of July of 2002 through  
6 October of 2002 including but not limited to the records of operation, federal registration, state  
7 registration, AND title.

8 DEMAND FOR PRODUCTION AND INSPECTION NO. 49:

9 ALL DOCUMENTS filed with ANY AUTHORITY RELATING TO GOLDEN STATE's  
10 operation of the BUS during the year of 2002.

11 DEMAND FOR PRODUCTION AND INSPECTION NO. 50:

12 ALL DOCUMENTS filed with ANY AUTHORITY RELATING TO YOUR operation of  
13 the BUS during the year of 2002.

14 DEMAND FOR PRODUCTION AND INSPECTION NO. 51:

15 ANY filing of insurance by OR on behalf of YOU with ANY AUTHORITY during the year  
16 of 2002 including but not limited to the Department of Transportation AND the State of California.

17 DEMAND FOR PRODUCTION AND INSPECTION NO. 52:

18 ALL DOCUMENTS RELATING TO the bankruptcy of GOLDEN STATE.

19  
20 DEMAND FOR PRODUCTION AND INSPECTION NO. 53:

21 ALL DOCUMENTS RELATING TO ANY federal OR state indictment of GOLDEN  
22 STATE for the time period of 1998 through 2004.

23 DEMAND FOR PRODUCTION AND INSPECTION NO. 54:

24 ALL DOCUMENTS RELATING TO ANY criminal prosecution against GOLDEN STATE  
25 RELATING TO the ACCIDENT.

26 DEMAND FOR PRODUCTION AND INSPECTION NO. 55:

27 ALL DOCUMENTS RELATING TO ANY criminal prosecution against YOU RELATING  
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1 TO the ACCIDENT.

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3 DEMAND FOR PRODUCTION AND INSPECTION NO. 56:

4 ALL DOCUMENTS RELATING TO ANY criminal prosecution against PULIDO  
5 RELATING TO the ACCIDENT.

6 DEMAND FOR PRODUCTION AND INSPECTION NO. 57:

7 ALL DOCUMENTS RELATING TO the employment of PULIDO including but not limited  
8 to his employment application, personnel file, driving record, driving history, citations, AND  
9 violations.

10 DEMAND FOR PRODUCTION AND INSPECTION NO. 55:

11 A complete copy of PULIDO's log book for the time period of January 1, 2002 through  
12 September 1, 2002.  
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Receipt 13254821

**Receipt** submitted on 12/20/2006 5:46:01 PM (ET)

Date/Time (ET)	Status
1/8/2007 2:18:00 PM	Received Signed Service Affidavit for order (Sistema Internacional de Transporte de Autobuses, Inc. - Attn: Custodian of Records)
1/5/2007 3:15:00 PM	Successfully performed service (Sistema Internacional de Transporte de Autobuses, Inc. - Attn: Custodian of Records)
12/20/2006 5:46:09 PM	Order request received (Order ID 8203364)
12/20/2006 5:46:04 PM	Service request has been submitted.

**Fee Information**

Fee Information	Total Recipients	Subtotal	Tax	Total
SOP Fast Service Fee (2-4 business days)	1	\$145.00	\$0.00	\$145.00
SOP Additional Service Fee	1	\$145.00	\$0.00	\$145.00
SOP Additional Service Fee	1	\$145.00	\$0.00	\$145.00
SOP Additional Service Fee	1	\$145.00	\$0.00	\$145.00
<b>Totals</b>		<b>\$580.00</b>	<b>\$0.00</b>	<b>\$580.00</b>

**Document List**

Document Title	File Name	Conversion Status	View
U.S. District Court Norther District of Texas Subpoena in a Civil Case	7863763_Subpoena-Sistema.pdf	Converted	<a href="#">PDF format</a> <a href="#">Original format</a>
Signed Service Affidavit for order (Sistema Internacional de Transporte de Autobuses, Inc. - Attn: Custodian of Records)	7990498_ServiceRequestConf.pdf	Converted	<a href="#">PDF format</a> <a href="#">Original format</a>

**Recipients**

Service Recipient	Address(es)	Description	Service Status
Sistema Internacional de Transporte de Autobuses, Inc. - Attn: Custodian of Records	Address Type: Business 600 Six Flags Drive, Suite 300 Arlington, TX 76011		Served

**Service Options**

Service Options	Selected Option
Deadline for Service	12/27/2006
Hearing Date	
Billing Reference	AC4699

File Affidavit of Service with Court? No

Special Instructions

**Contact Information**

**Contact Information**

Name Maureen Davis

Contact Email Address mdavis@moralesgary.com

Organization Morales & Gary

Organization Address 2300 Contra Costa Blvd Ste 310  
Pleasant Hill, CA 94523-3961

Phone: (925) 288-1776

Fax: (925) 288-1856

Email: dmorales@moralesgary.com